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REC'D TN
REGULATORY AUTH.
*01 FEB 1 PM 2 45
February 2, 2001
EXECUTIVE SECRETARY

Guy M. Hicks
General Counsel

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VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Third Party Testing of BellSouth OSS*
Docket No. 99-00347

Dear Mr. Waddell:

Enclosed please find fourteen copies of the following documents which have been filed with the Georgia Public Service Commission ("GPSC").

<u>Date Filed</u>	<u>Description of Document(s)</u>
12/13/00	KPMG December 2000 Interim Status Report
12/14/00	KPMG Closure Reports for Exceptions 22, 46, 49, 52, 53, 73, 88, 90, 96 and 101
12/14/00	KPMG Exceptions 116, 117, and 118; Amended Exceptions 95 and 115; 2 nd Amended Exception 68; 3 rd Amended Exception 76; BST Response to Exceptions 116, 117 and 118; Amended Response to Exception 77; 2 nd Amended Response to Exceptions 68 and 113; 4 th Amended Response to Exception 38
01/05/01	KPMG Closure Reports for Exceptions 23, 57, 61, 66, 70, 74, 83, 84, 87, 97, 110 and 111
01/05/01	KPMG Exception 119 and Amended Exception 117; BST Response to Exception 119; Amended Response to Exception 117; and 2 nd Amended Exception 76

David Waddell, Executive Secretary
February 2, 2001
Page 2

Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH:ch

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2001, a copy of the foregoing document was served on counsel for the petitioner and the entities seeking intervention, via the method indicated, addressed as follows:

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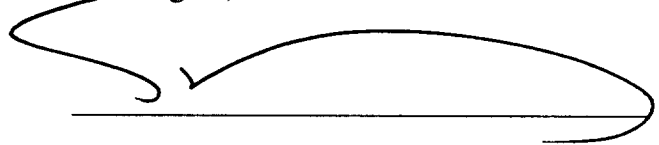
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December 13, 2000

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
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Atlanta, GA 30334

RECEIVED

DEC 13 2000

EXECUTIVE SECRETARY
G.P.S.C.

RE: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Docket No. 8354-U

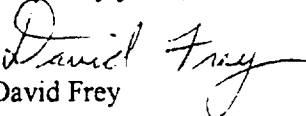
Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting LLC's Interim Status Report dated December 13, 2000.

We request that this document be filed in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,


David Frey
Manager

Enclosures

cc: Parties of Record



1.0 Document Objective

In this document, KPMG Consulting (KCL) provides a summary interim status report on developments related to the BellSouth-GA OSS Test. A brief overview of key developments is provided in section 2.0. Key upcoming activities are summarized in section 3.0. A detailed report on specific Master Test Plan (MTP) items is provided in the table in section 4.0. A detailed report on specific Supplemental Test Plan (STP) items is provided in the table in section 5.0. Each item presented in the tables in sections 4.0 and 5.0 includes a reference number that identifies the item from a previous status report, where applicable. A detailed report on Exceptions is provided in the table in section 6.0.

2.0 Key Developments

- **Ordering:**
 - KCL completed submission of all transactions associated with the functional re-test. KCL continues to use the results of this functional re-test to evaluate a number of open exceptions.
- **Performance measurement reporting (Metrics):**
 - MTP: KCL is completing its update of the calculation validation programs to apply to the October SQM values for the KCL Test CLEC.
 - MTP: KCL continues the following testing activities: 1) Calculation of SQM values of PMAP-generated and manually-generated SQMs for the CLEC aggregate and BellSouth retail; 2) Comparison of early stage data to raw data.
- **Provisioning verification:**
 - KCL has concluded provisioning verifications re-testing activities, including evaluations of Switch translations, CSRs and DL records.
- **Change management:**
 - KCL has completed all OSS '99 Release Evaluation test activities.

3.0 Key Upcoming Activities

- KCL expects to continue to focus efforts on: 1) exception re-testing and closure activities; and 2) drafting and reviewing the MTP and STP reports.

4.0 Master Test Plan Specific Item Status

Ref	Item	Status	Issues	Next Step/Resolution
I-6	EDI functional testing	<ul style="list-style-type: none"> KCL issued the following exceptions, related to EDI functional testing, that remain open: Exceptions 9, 26, 31, 32, 38, 39, 47, 60, 68, 77, 78, 95, 97, 98 & 118. KCL is clarifying a closure report for Exception 9 based on GPSC comments. KCL is drafting a closure report for Exception 26. KCL is awaiting GPSC comments on closure reports for Exceptions 31, 39 and 97. KCL filed a re-opening statement for Exception 47 with the GPSC. 	<ul style="list-style-type: none"> The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized.

**BellSouth-GA OSS Testing Evaluation
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Ref	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> KCL completed submission of all transactions associated with the functional re-test. Re-testing was conducted to evaluate current BLS performance with respect to the following issues: 1) Completion Notification (CN) timeliness; 2) Functional Acknowledgement (FA) timeliness; 3) FOC Due Date accuracy compared to LSR Desired Due Date requests; 4) Loop Service with Directory Listing ordering process; 5) Order validation process for invalid LPIC entries on UNE-Port service requests; 6) Inaccurate FOC responses (confirmations received on invalid service requests); 7) Fully-Mechanized (FM) Clarification (CLR) timeliness; 8) Partially Mechanized (PM) CLR timeliness; 9) Flow Through Firm Order Confirmation (FOC) timeliness; 10) Non-Flow Through FOC timeliness; and 11) "Final Account" errors received in response to UNE Loop migration service requests. 	<ul style="list-style-type: none"> Based on re-test results, KCL observed that test performance was below benchmarks specified by the GPSC or, absent GPSC-approved standards, by KCL in the following areas: FOC DD accuracy (3); FM CLR timeliness (7); and FT FOC timeliness (9). 	<ul style="list-style-type: none"> KCL continues to employ the results of the functional re-test to evaluate a number of open exceptions.
	<ul style="list-style-type: none"> KCL previously reported that, based on re-test activities, BLS adequately addressed LPIC validations on UNE-Port orders (5); inaccurate FOC responses (6); and Final Account errors on UNE Loop orders (11). Additionally, based on re-test activities, KCL determined that BLS has adequately addressed FA Timeliness (2); Loop Service with Directory Listing ordering process (4); Partially Mechanized (PM) CLR timeliness (8); and Non-Flow Through FOC timeliness (10). 	<ul style="list-style-type: none"> None. 		<ul style="list-style-type: none"> N/A.

**BellSouth-GA OSS Testing Evaluation
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Ref	Item	Status	Issues	Next Step Resolution
		<ul style="list-style-type: none"> A number of re-test transactions received Clarifications (CLRs) in error. For these valid service requests, BLS ordering representatives erroneously issued CLRs. Following discussions with BLS, KCL resubmitted these transactions and received FOCs. A number of re-test transactions have not received Completion Notices. KCL has determined transactions to be missing CNs for several reasons: 1) BLS representatives mistakenly cancelled service orders residing in a post-FOC error status (due to billing or listing downstream errors); 2) For a number of LNP orders, the status of the TN porting (processed through the Number Portability Administration Center – NPAC) is in dispute. BLS does not transmit LNP CNs until all associated TNs have been ported by the CLEC; 3) The cause of missing CNs for remaining transactions is still under investigation. 	<ul style="list-style-type: none"> These inaccurate CLRs represent a problem initially presented in Exception 47. The cause of missing CNs must be established prior to conclusion of re-testing activity. 	<ul style="list-style-type: none"> KCL has re-opened Exception 47 to address this issue. KCL is referring NPAC ID information from relevant 'friendly' CLEC's LNP orders to BLS for additional investigation. BLS is also investigating the remaining missing CNs.
I-7	TAG functional testing	<ul style="list-style-type: none"> KCL issued the following exceptions, related to TAG functional testing, that remain open: Exceptions 9, 26, 31, 38, 39, 47, 60, 68, 77, 78, 95, 97, 98 & 118. KCL is clarifying a closure report for Exception 9 based on GPSC comments. KCL is drafting a closure report for Exception 26. KCL is awaiting GPSC comments on closure reports for Exceptions 31, 39 and 97. KCL filed a re-opening statement for Exception 47 with the GPSC. 	<ul style="list-style-type: none"> The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized.

**BellSouth-GA OSS Testing Evaluation
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Ref	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> As previously reported, KCL completed submission of all transactions associated with the functional re-test. Re-testing was conducted to evaluate current BLS performance with respect to the following issues: 1) Completion Notification (CN) timeliness; 2) FOC Due Date accuracy compared to LSR Desired Due Date requests; 3) Loop Service with Directory Listing ordering process; 4) Order validation process for invalid LPIC entries on UNE-Port service requests; 5) Inaccurate FOC responses (confirmations received on invalid service requests); 6) Fully-Mechanized (FM) Clarification (CLR) timeliness; 7) Partially Mechanized (PM) CLR timeliness; 8) Flow Through Firm Order Confirmation (FOC) timeliness; 9) Non-Flow Through FOC timeliness; and 10) "Final Account" errors received in response to UNE Loop migration service requests. 	<ul style="list-style-type: none"> Based on re-test results, KCL observed that test performance was below benchmarks specified by the GPSC or, absent GPSC-approved standards, by KCL in the following areas: FOC DD accuracy (2); FM CLR timeliness (6); and FT FOC timeliness (8). 	<ul style="list-style-type: none"> KCL continues to employ the results of the functional re-test to evaluate a number of open exceptions.
	<ul style="list-style-type: none"> KCL previously reported that, based on re-test activities, BLS adequately addressed LPIC validations on UNE-Port orders (4); inaccurate FOC responses (5); and Final Account errors on UNE Loop orders (10). Additionally, based on re-test activities, KCL determined that BLS adequately addressed Loop Service with Directory Listing ordering process (3); and Partially Mechanized (PM) CLR timeliness (7). 	<ul style="list-style-type: none"> None. 		<ul style="list-style-type: none"> N/A.

**BellSouth-GA OSS Testing Evaluation
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RCI	Item	Status	Issues	Next Step/Resolution
	<ul style="list-style-type: none"> A number of re-test transactions received Clarifications (CLRs) in error. For these valid service requests, BLS ordering representatives erroneously issued CLRs. Following discussions with BLS, KCL resubmitted these transactions and received FOCs. 	<ul style="list-style-type: none"> A number of re-test transactions have not received Completion Notices. KCL has determined transactions to be missing CNs for several reasons: 1) BLS representatives mistakenly cancelled service orders residing in a post-FOC error status (due to billing or listing downstream errors); 2) For a number of LNP orders, the status of the TN porting (processed through the Number Portability Administration Center - NPAC) is in dispute. BLS does not transmit LNP CNs until all associated TNs have been ported by the CLEC; 3) The cause of missing CNs for remaining transactions is still under investigation. 	<ul style="list-style-type: none"> These inaccurate CLRs represent a problem initially presented in Exception 47. 	<ul style="list-style-type: none"> KCL has re-opened Exception 47 to address this issue.
	<ul style="list-style-type: none"> A number of re-test transactions have not received Completion Notices. KCL has determined transactions to be missing CNs for several reasons: 1) BLS representatives mistakenly cancelled service orders residing in a post-FOC error status (due to billing or listing downstream errors); 2) For a number of LNP orders, the status of the TN porting (processed through the Number Portability Administration Center - NPAC) is in dispute. BLS does not transmit LNP CNs until all associated TNs have been ported by the CLEC; 3) The cause of missing CNs for remaining transactions is still under investigation. 	<ul style="list-style-type: none"> The cause of missing CNs must be established prior to conclusion of re-testing activity. 	<ul style="list-style-type: none"> KCL is referring NPAC ID information from relevant 'friendly' CLEC's LNP orders to BLS for additional investigation. BLS is also investigating the remaining missing CNs. 	

**BellSouth-GA OSS Testing Evaluation
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Ref	Item	Status	Issues	Next Step/Resolution
	Pre-Order Functional Testing	<ul style="list-style-type: none"> KCL issued the following exceptions, related to Pre-Order functional testing, that remain open: Exceptions 24, 65, 66, 71 & 116. KCL is reviewing a closure report for Exceptions 65 internally. KCL is awaiting comments on a closure report for Exception 66 from the GPSC. KCL submitted a draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response. In response to a previously-identified issue regarding the absence of Pre-Order Business Rules to document the requirements for populating the RSPRODUCT field within a Calculate Due Date (CDD) inquiry, BLS updated its Pre-Order Business Rule documentation. Version 9.0, released on November 9, 2000, contains adequate rules for populating the RSPRODUCT field on CDD requests. In response to a previously-identified issue regarding the inability to process Calculate Due Date (CDD) pre-order requests via TAG 2.2.0.11 for Loop-Port Combination-related service orders, BLS provided a workaround solution. KCL was able to successfully process Loop-Port Combination CDD requests utilizing this workaround. BLS posted notification of this workaround on its Web site. 	<ul style="list-style-type: none"> The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. None. None. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized. N/A. N/A.

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Ref	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> In response to a previously-identified issue regarding discrepancies identified between service intervals obtained from BLS documentation versus those obtained from CDD pre-order queries, KCL re-submitted Loop-Port Combination-related CDD requests via TAG Version 2.2.0.1.1. No additional discrepancies on Loop-Port Combinations CDD requests were uncovered. 	<ul style="list-style-type: none"> KCL did uncover discrepancies on Directory Listing-related CDD requests. BLS responded that Directory Listing requests contain a 0 day interval and do not require CDD inquiries. BLS's current documentation (Product and Services Interval Guide) does not contain reference to a 0 day interval. 	<ul style="list-style-type: none"> BLS plans to issue an updated version of its Products and Services Interval Guide on December 15, 2000 to include appropriate Directory Listing intervals. KCL will review the updated documentation to ensure consistency with CDD-returned intervals.
I-8	CRIS/CABS Invoicing Functional Test	<ul style="list-style-type: none"> KCL issued the following exception, related to CRIS/CABS invoicing functional testing, that remains open: Exception 16. KCL is reviewing a closure report for Exception 16 internally. 	<ul style="list-style-type: none"> The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized.
II-1	Metrics	<ul style="list-style-type: none"> KCL issued the following exceptions, related to Metrics (MTP - Performance Measures Evaluations) that remain open: Exceptions 23, 46, 74, 110, 111 and 113. KCL is awaiting comments on closure reports for Exceptions 23, 74 and 111 from the GPSC. KCL is reviewing a closure report for Exception 46 internally. KCL is clarifying the closure report for Exception 110 based on GPSC comments. Additionally, KCL submitted two draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response. KCL is completing its update of the calculation validation programs to apply to October SQM values for the KCL Test CLEC. 	<ul style="list-style-type: none"> The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized.
			<ul style="list-style-type: none"> KCL anticipates identifying issues, if any, within the next week. 	<ul style="list-style-type: none"> If KCL finds any discrepancies, KCL will bring them to the attention of BLS via draft exceptions.

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KCL #	Item	Status	Issues	Next Step/Resolution
II-4	Volume Test	<ul style="list-style-type: none"> KCL continues to compare the transaction data generated and collected by the KCL Test CLEC to similar data reported by BLS. KCL has concluded its investigation of potential missing FOCs from the 7/17/00 peak volume test. 	<ul style="list-style-type: none"> KCL identified issues to BLS via draft exceptions. KCL had identified specific PONs to BLS for which FOCs were not received. BLS maintained that FOCs were returned to HP/KCL for the LSRs in question. 	<ul style="list-style-type: none"> KCL will continue testing and exception re-testing activities. BLS established to KCL's satisfaction that the FOCs were generated properly.
II-5	Change Management (CM-1)	<ul style="list-style-type: none"> As a follow-up to the 10/17/00 and 11/1/00 CCP process improvement meetings, BLS and CLECs conducted a third meeting on 12/7/00. KCL observed this session. KCL previously identified a possible change control process deficiency related to BLS's introduction of the <i>BLS Business Rules for Local Ordering, Issue 9G</i>. As documentation defects are within the stated scope of the <i>Change Control Process</i>, KCL determined that some publication version changes were not being appropriately channeled through the existing change control process. BLS revised its internal procedures to ensure that corrections to documentation defects are properly channeled through the change control process. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> KCL expects to continue to observe enhancements and changes to the published <i>Change Control Process</i>. N/A.
III-1	Flow-Through Evaluation	<ul style="list-style-type: none"> KCL re-opened the following exception related to Flow Through: Exception 21. 	<ul style="list-style-type: none"> The status of exceptions and draft exceptions is detailed in Section 6.0 Exceptions Status. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized.
IV-3	ODUF/ADUF usage functional test	<ul style="list-style-type: none"> KCL issued the following exception related to ODUF/ADUF usage functional testing that remains open: Exception 28. KCL is reviewing a closure report for Exception 28 internally. 	<ul style="list-style-type: none"> The status of exceptions and draft exceptions is detailed in Section 6.0 Exceptions Status. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized.

BellSouth-GA OSS Testing Evaluation
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Item		Status	Issues	Next Step/Resolution
V-2	Provisioning Verification	<ul style="list-style-type: none"> KCL issued the following exceptions related to Provisioning Verification that remain open: 76 & 106. KCL is reviewing a closure report for Exception 106. 	<ul style="list-style-type: none"> The status of exceptions and draft exception is detailed in <i>Section 6.0 Exceptions Status</i>. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized.
		<ul style="list-style-type: none"> KCL concluded provisioning re-test activity, including evaluations of Switch translations, CSRs and DL records. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> KCL expects to employ the results of the functional re-test to evaluate open exceptions.
		<ul style="list-style-type: none"> There are no open exceptions related to the Pre-Ordering, Ordering and Provisioning Documentation Review. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> N/A.
V-3	Pre-ordering, Ordering and Provisioning Documentation Review	<ul style="list-style-type: none"> KCL's <i>Documentation Issues Log</i> contains eight active issues. Six of these issues are pending resolution. BLS continues to research two issues. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> KCL expects to continue to work with BLS to identify and resolve outstanding documentation deficiencies.

5.0 Supplemental Test Plan Specific Item Status

Ref		Item	Status	Issues	Next Step/Resolution
VII-4	Metrics		<ul style="list-style-type: none"> KCL issued the following exceptions, related to Metrics (STP - Performance Measures Evaluations) that remain open: Exceptions 61, 70, 79, 83, 84, 86, 87, 89, 92, 93 and 105. KCL is reviewing closure reports for Exceptions 61 and 105 internally. KCL is awaiting comments on closure reports for Exceptions 70, 83, 84, 87, and 93 from the GPSC. KCL has submitted two draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response. 	<ul style="list-style-type: none"> The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized.
			<ul style="list-style-type: none"> KCL continues the following testing activities: 1) Calculation of SQM values of PMAP-generated and manually-generated SQMs for the CLEC aggregate and BLS retail; 2) Comparison of early stage data to raw data. 	<ul style="list-style-type: none"> KCL has identified exceptions related to these activities. 	<ul style="list-style-type: none"> KCL will continue testing and exception re-testing activities.
			<ul style="list-style-type: none"> KCL continues to test BLS metrics as defined by the June 6, 2000 GPSC order. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> KCL will publish any issues or discrepancies found in the <i>Birmingham Issues Log</i>.
IX-2	PO&P11 - EDI & TAG Resale Functional Evaluation		<ul style="list-style-type: none"> KCL issued the following exceptions related to EDI & TAG resale functional testing, that remain open: Exceptions 26, 49, 60, 68, 71, 77, 78, 95, 98, 102 & 114. KCL is drafting a closure report for Exception 26. 	<ul style="list-style-type: none"> The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized.

**BellSouth-GA OSS Testing Evaluation
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Ref	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> KCL has uncovered instances of inaccurate FOCs in response to Resale orders. Based on information obtained during provisioning tests, KCL discovered that a number of Resale orders were submitted with errors. These submissions should have received Clarifications from BLS. 	<ul style="list-style-type: none"> KCL identified this issue to BLS via Exception 95. KCL expects to file an amended version of Exception 95 with the GPSC shortly. 	<ul style="list-style-type: none"> KCL expects to receive an amended response from BLS in the near future.
IX-3	PO&P12 - xDSL Functional Evaluation	<ul style="list-style-type: none"> KCL issued the following exceptions, related to xDSL functional testing, that remain open: Exceptions 57, 112, 115 & 117. KCL has submitted one draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response. KCL is awaiting comments on the closure report for Exception 57 from the GPSC. KCL has concluded submission and receipt of pre-order and orders related to the manual ordering of xDSL capable loops for TCIF9. 	<ul style="list-style-type: none"> The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. KCL has identified the following potential issues via the exception process: 1) An LMU/SL timeliness issue; 2) the lack of a documented acknowledgement process; 3) a CLR timeliness issue; 4) BLS does not support ordering designed and non-designed loops linked with an RPON for manually submitted LMU/SLs; 5) An LSR/SL timeliness issue; 6) the lack of acknowledgement and tracking processes for manually submitted LSR/SLs. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized. KCL expects to continue to monitor these issues.
IX-4	PO&P-14 - Resale and xDSL Documentation Evaluation	<ul style="list-style-type: none"> KCL has completed its review of the new release of BLS's xDSL documentation for structure and format. There are no open exceptions related to PO&P14. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> N/A.

**BellSouth-GA OSS Testing Evaluation
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Ref	Item	Status	Issues	Next Step/Resolution
IX-6	PO&P16 - xDSL Process Parity	<ul style="list-style-type: none"> KCL issued the following exceptions, related to xDSL process parity, that remain open: Exceptions 107 & 108. KCL is reviewing a closure report for Exception 107 internally. KCL is drafting a closure report for Exception 108. 	<ul style="list-style-type: none"> The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized.
IX-9	BLG7 - CRIS Resale Invoicing Functional Evaluation	<ul style="list-style-type: none"> KCL issued the following exceptions, related to the CRIS Resale Invoicing Functional Evaluation, that remain open: Exception 103. KCL submitted a draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response. KCL is reviewing a closure report for Exception 103 internally. 	<ul style="list-style-type: none"> The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized.
IX-10	BLG8 - Resale Usage Functional Evaluation	<ul style="list-style-type: none"> KCL issued the following exception, related to EDI functional testing, that remains open: Exception 94. KCL continues to clarify its closure report for Exception 94 based on the GPSC's comments. 	<ul style="list-style-type: none"> The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. 	<ul style="list-style-type: none"> All exceptions must be closed for purposes of the test before reports can be finalized.
IX-11	CM2 - OSS '99 Release Evaluation	<ul style="list-style-type: none"> OSS '99 Release Evaluation testing activities have been completed. KCL has no open exceptions related to this test. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> N/A.

**BellSouth-GA OSS Testing Evaluation
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6.0 Exceptions² Status

Ref	Item	Status	Issues	Next Step/Resolution
IV-5	Exceptions	<ul style="list-style-type: none"> KCL is clarifying a closure report for Exception 9, regarding Ordering & Provisioning, based on comments from the GPSC. 	<ul style="list-style-type: none"> KCL indicated that BLS failed to deliver Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests. 	<ul style="list-style-type: none"> KCL expects to re-submit this closure report to the GPSC for review upon completion.
		<ul style="list-style-type: none"> KCL is reviewing a closure report for Exception 16, regarding Billing, internally. 	<ul style="list-style-type: none"> KCL indicated that BLS issued multiple bills containing erroneous information to KCL. 	<ul style="list-style-type: none"> After internal review, KCL expects to submit this closure report to the GPSC.
		<ul style="list-style-type: none"> KCL is conducting re-testing activities related to Exception 21 (Re-opened), regarding Flow-Through. 	<ul style="list-style-type: none"> KCL indicated that, based on subsequent testing activities, the change implemented by BLS does not properly classify "Z" processing status LSRs for the purposes of the Flow Through Report. 	<ul style="list-style-type: none"> KCL's further activities will be based on the outcome of re-testing activities.
		<ul style="list-style-type: none"> KCL expects to file a closure report for Exception 22, regarding Ordering and Provisioning, with the GPSC shortly. None of KCL's service requests for UNE Loop migrations submitted during re-testing and falling into error status received a subsequent "Final Account" error message. Based on the absence of the "Final Account" error message in response to re-test orders, KCL finds no evidence of a continued BellSouth problem with disconnecting retail accounts of UNE Loop orders in error status. 	<ul style="list-style-type: none"> KCL indicated that BLS disconnected retail accounts on loop migration orders without re-connecting the UNE loop component. 	<ul style="list-style-type: none"> N/A.
		<ul style="list-style-type: none"> The GPSC is reviewing clarifications to a closure report for Exception 23, regarding Metrics. 	<ul style="list-style-type: none"> KCL indicated that it cannot replicate five of BLS's reported Service Quality Measurements. 	<ul style="list-style-type: none"> KCL expects to file this closure statement upon completion of the GPSC's review.
		<ul style="list-style-type: none"> KCL is reviewing BLS's amended response to Exception 24, regarding Ordering and Provisioning. 	<ul style="list-style-type: none"> KCL indicated that BLS's TAG API does not deliver timely responses to pre-order transactions. 	<ul style="list-style-type: none"> KCL's further activities will be based on its analysis of BLS's amended response.
		<ul style="list-style-type: none"> KCL is drafting a closure report for Exception 26, regarding Ordering and Provisioning. 	<ul style="list-style-type: none"> KCL indicated that BLS does not deliver timely Completion Notices (CNs). 	<ul style="list-style-type: none"> After internal review, KCL expects to submit this closure report to the GPSC.

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		<ul style="list-style-type: none"> KCL continues to review a closure report for Exception 28, regarding Billing, internally. 	<ul style="list-style-type: none"> Amended Exception: KCL indicated that BLS failed to deliver DUF records for twenty-seven percent (27%) of the re-test calls for which records were expected. <u>Initial Exception:</u> KCL indicated that BLS failed to deliver 46% of expected DUF records to KCL. 	<ul style="list-style-type: none"> After internal review, KCL expects to submit this closure report to the GPSC.
	<ul style="list-style-type: none"> The GPSC is reviewing KCL's closure report for Exception 31, regarding Ordering and Provisioning. 		<ul style="list-style-type: none"> KCL indicated that BLS's electronic ordering systems do not adequately support CLEC requests for Directory Listings associated with UNE loop customers. 	<ul style="list-style-type: none"> KCL expects to file this closure statement upon completion of the GPSC's review.
	<ul style="list-style-type: none"> KCL filed a closure report for Exception 32, regarding Ordering and Provisioning, with the GPSC on 11/14/00. Following BellSouth's training of its ordering service representatives, KCL experienced only one additional service request receiving both a CLR and FOC on the same version. As a result, KCL has determined that this training has adequately reduced the potential re-occurrence of the delivery of an FOC after the issuance of a CLR on the same version of an order. Additionally, BellSouth's plan is to minimize manual intervention through a feature enhancement to its electronic ordering systems seeks to further ensure that FOCs are not issued subsequent to the transmission of a CLR. BellSouth has expressed to KCL that implementing the enhancement is a high priority, and is scheduled to take place in the first quarter of 2001. Since BellSouth's Targeted Release Date for this feature enhancement – during the first quarter of 2001 – is outside the expected timeframe of the BellSouth-Georgia OSS Evaluation, KCL does not expect to issue orders to re-test system functionality following implementation of the feature. However, KCL's experience indicates that, if properly implemented, the feature (Modify and re-send FOCs & CLRs for LNP) would represent a further step to address the issue outlined in Exception 32. 		<ul style="list-style-type: none"> KCL indicated that BLS delivered FOCs on transactions after issuing Clarifications (CLRs). 	<ul style="list-style-type: none"> N/A.

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		<ul style="list-style-type: none"> KCL is reviewing an amended response from BLS for Exception 38, regarding Ordering and Provisioning. 	<ul style="list-style-type: none"> KCL indicated that BLS does not consistently provide CLECs with a service Due Date matching their Desired Due Date. 	<ul style="list-style-type: none"> KCL's further activities will be based upon its analysis of BLS's amended response.
		<ul style="list-style-type: none"> The GPSC is reviewing KCL's closure report for Exception 39, regarding Ordering and Provisioning. 	<ul style="list-style-type: none"> KCL indicated that BLS's electronic ordering systems do not provide the functionality required for submitting partial migrations to UNE loops. 	<ul style="list-style-type: none"> KCL expects to file this closure statement upon completion of the GPSC's review.
		<ul style="list-style-type: none"> KCL continues to review a closure report for Exception 46, regarding Metrics, internally. 	<ul style="list-style-type: none"> KCL indicated that it cannot replicate seven of BLS's reported Service Quality Measurements. 	<ul style="list-style-type: none"> After internal review, KCL expects to submit this closure report to the GPSC.
		<ul style="list-style-type: none"> KCL filed a Statement of Re-Opening for Exception 47, regarding Ordering & Provisioning, with the GPSC. 	<ul style="list-style-type: none"> KCL indicated that BellSouth delivered inaccurate partially-mechanized CLR's. 	<ul style="list-style-type: none"> KCL's further activities will be based upon BLS's response to the Statement of Re-Opening.
		<ul style="list-style-type: none"> KCL expects to file a closure report for Exception 49, regarding Ordering & Provisioning, with the GPSC shortly. Based on KCL's review of the Carrier Notification Process, KCL concludes that BellSouth's updated carrier notification methods and procedures, including prior notification of changes to USOCs (inclusive of effective date of change and tariff reference), should adequately address the issue identified in the exception report. 	<ul style="list-style-type: none"> KCL indicated that BLS did not provide an accurate and timely update to CLECs when implementing a Universal Service Order Code (USOC) change. 	<ul style="list-style-type: none"> N/A.
		<ul style="list-style-type: none"> KCL expects to file a closure report for Exception 52, regarding Metrics, with the GPSC shortly. Based on revisions made by BLS to the <i>Raw Data Users Manual</i>, clarifications made to the instructions for performing calculations, and corrections to the PMAP, KCL was able to match exactly the twelve SQMs calculated by BLS. As a result, KCL believes that BLS adequately addressed all the issues outlined in the exception. 	<ul style="list-style-type: none"> KCL indicated that it cannot replicate twelve of BLS's reported Service Quality Measurements (SQMs). 	<ul style="list-style-type: none"> N/A.

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		<ul style="list-style-type: none"> KCL expects to file a closure report for Exception 54, regarding Ordering & Provisioning, with the GPSC shortly. All three electronically-submitted LSRs for UNE Loop-Port Combination - to - UNE Loop with LNP migrations were successfully processed by BellSouth electronic ordering systems. All transactions received Firm Order Confirmations (FOCs). BellSouth does not support other variations of UNE-to-UNE migrations in the TCIF 7 releases of its ordering interfaces. BellSouth has submitted requests via the Change Control Process to introduce this ordering functionality into a TCIF 9 interface release. This functionality addition is proceeding through the Change Control Process (see CR0030 for additional information and implementation schedule). Pursuant to direction from the Georgia Public Service Commission (GPSC), KCL evaluated those services that are electronically-orderable in BellSouth's TCIF 7 release of its ordering interfaces. KCL produced this exception with the belief that various types of UNE-to-UNE migrations are electronically orderable in TCIF 7. However, after subsequent investigation KCL determined that the only UNE-to-UNE migration activity electronically orderable in TCIF 7 is a conversion from UNE Loop-Port Combination to UNE Loop with LNP. As a result, the ordering of other variations of UNE-to-UNE migrations is not within the scope of the evaluation of services that are electronically-orderable in TCIF 7, as specified by the GPSC. The Georgia Public Service Commission may elect to monitor this issue with respect to subsequent TCIF releases in the future. In the absence of any other planned test activity, KCL closes this exception for testing purposes. 	<ul style="list-style-type: none"> KCL indicated that BLS's electronic ordering systems do not support UNE-to-UNE migration service requests. 	<ul style="list-style-type: none"> N/A.
		<ul style="list-style-type: none"> The GPSC is reviewing KCL's closure report for Exception 57, regarding xDSL. 	<ul style="list-style-type: none"> KCL indicated that BLS guidelines for submitting xDSL pre-order Service Inquiry (SIs) for Loop Make-Up (LMU) information do not exist. 	<ul style="list-style-type: none"> KCL expects to file this closure statement upon completion of the GPSC's review.

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	<ul style="list-style-type: none">KCL is reviewing an amended response from BLS for Exception 60 (Amended), regarding Ordering and Provisioning.KCL is reviewing a closure report for Exception 61, regarding Metrics, internally.The GPSC is reviewing KCL's closure report for Exception 66, regarding Pre-Ordering.KCL expects to file Exception 68 (2nd Amended), regarding Ordering and Provisioning, with the GPSC shortly.The GPSC is reviewing clarifications to a closure report for Exception 70, regarding Metrics.KCL is reviewing BLS's amended response to Exception 71, regarding Ordering and Provisioning.KCL expects to file a closure report for Exception 73, regarding Billing, with the GPSC shortly. Upon review of the "BellSouth CLEC Billing Guide"; the "Understanding Your Bill" document and other documentation (i.e., BellSouth tariffs and OBF CBOS BDT Guidelines), KCL found that BellSouth's responses addressed the five deficiencies noted in the Exception and support the validation of CRIS and CABS CLEC bills.	<ul style="list-style-type: none">KCL indicated that BLS does not deliver timely Functional Acknowledgements (FAs) via Electronic Data Interchange (EDI).KCL indicated that for certain Service Quality Measurements ("SQMs"), BLS does not report values at all levels of disaggregation specified in the Service Quality Measurements Georgia Performance Report 10/22/99 (SQM Reports).KCL indicated that BLS does not provide complete pre-order responses via the TAG interface.KCL indicated that BLS does not provide complete Firm Order Confirmation (FOC) and Completion Notice (CN) responses.KCL indicated that BLS does not have an adequate change management process for the generation of Service Quality Measurement (SQM) data from its legacy/source systems.KCL indicated that the service establishment intervals returned on Calculate Due Date (CDD) pre-order responses are not consistent with intervals defined in the BLS <i>Product and Services Interval Guide</i>.KCL indicated that BLS's CRIS/CABS billing documentation is deficient in the breadth and depth of topical coverage.	<ul style="list-style-type: none">KCL's further activities will be based on its analysis of BLS's amended response.After internal review, KCL expects to submit this closure report to the GPSC.KCL expects to file this closure statement upon completion of the GPSC's review.KCL's further activities will be based on BLS's response to the amended exception.KCL expects to file this closure statement upon completion of the GPSC's review.KCL's further activities will be based on its analysis of BLS's amended response.N/A.	

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	<ul style="list-style-type: none"> The GPSC is reviewing KCL's closure report for Exception 74, regarding Metrics. 		<ul style="list-style-type: none"> KCL indicated that BLS does not report certain Georgia Service Quality Measurements at the levels of disaggregation specified in the Service Quality Measurements Georgia Performance Reports. 	<ul style="list-style-type: none"> KCL expects to file this closure statement upon completion of the GPSC's review.
	<ul style="list-style-type: none"> KCL expects to file Exception 76 (3rd Amended), regarding Ordering and Provisioning, with the GPSC shortly. 		<ul style="list-style-type: none"> KCL indicated that it encountered numerous BLS provisioning errors for UNE orders. 	<ul style="list-style-type: none"> KCL's further activities will be based on BLS's response to the amended exception.
	<ul style="list-style-type: none"> KCL filed Exception 77 (Amended), regarding Ordering and Provisioning, with the GPSC. 		<ul style="list-style-type: none"> KCL indicated that BLS does not deliver timely fully mechanized Clarification (CLR) responses. 	<ul style="list-style-type: none"> KCL's further activities will be based on BLS's response to the amended exception.
	<ul style="list-style-type: none"> KCL is reviewing BLS's amended response to Exception 78, regarding Ordering and Provisioning. 		<ul style="list-style-type: none"> KCL indicated that BLS does not deliver timely Firm Order Confirmation (FOC) responses to flow through local service requests (LSRs). 	<ul style="list-style-type: none"> KCL's further activities will be based on its analysis of BLS's amended response.
	<ul style="list-style-type: none"> KCL continues to clarifying issues related to Exception 79, regarding Metrics, with the GPSC. 		<ul style="list-style-type: none"> KCL indicated that BLS does not adequately retain certain source data used in the calculation of several Service Quality Measurement (SQM) reports that are not generated wholly or primarily by the Performance Measurement and Analysis Platform (PMAP). 	<ul style="list-style-type: none"> KCL's further activities will be based on the outcome of these discussions with the GPSC.
	<ul style="list-style-type: none"> The GPSC is reviewing a closure report for Exception 83, regarding Metrics. 		<ul style="list-style-type: none"> KCL indicated that exclusions listed in the "Exclusions" section of the SQM Georgia Performance Reports are not correctly applied when creating raw data or calculating SQMs. 	<ul style="list-style-type: none"> KCL expects to file this closure statement upon completion of the GPSC's review.
	<ul style="list-style-type: none"> The GPSC is reviewing a closure report for Exception 84, regarding Metrics. 		<ul style="list-style-type: none"> KCL indicated that the information in the SQM Georgia Performance Reports is inconsistent with the computational instructions provided by BLS for five SQMs. 	<ul style="list-style-type: none"> KCL expects to file this closure statement upon completion of the GPSC's review.
	<ul style="list-style-type: none"> KCL expects to perform re-testing activities related to Exception 86, regarding Metrics, shortly. 		<ul style="list-style-type: none"> KCL indicated that it cannot replicate six of BLS's reported Service Quality Measurements (SQMs). 	<ul style="list-style-type: none"> KCL's further activities will be based on the outcome of re-testing activities.

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		<ul style="list-style-type: none"> The GPSC is reviewing a closure report for Exception 87, regarding Metrics. 	<ul style="list-style-type: none"> KCL indicated that BLS incorrectly billed KCL for usage charges for messages processed in the Augusta central office. 	<ul style="list-style-type: none"> KCL expects to file this closure statement upon completion of the GPSC's review.
	<ul style="list-style-type: none"> KCL expects to file a closure report for Exception 88, regarding Metrics, with the GPSC shortly. KCL noted that BellSouth has made revisions to its process of updating the RDUM, as described in the updated Issues Management and Change Control Plan. Specifically, BellSouth has committed to ensuring that its validation scripts, RDUM, and SQM manual are synchronized, by allocating responsibility within BellSouth for updating the RDUM. As noted in BellSouth's response, SMEs and system programmers have been notified of these changes in responsibilities and procedures. Most importantly, change requests will be annotated to indicate that all updates to the RDUM have occurred, before the Request is closed. KCL reviewed over a dozen change requests that were issued after the new process went into effect. For all change requests that required an update to the RDUM, it was verified that such changes were implemented correctly. Finally, KCL believes that BellSouth's new numbering scheme for manuals will enable different versions to be tracked more easily. Additionally, BellSouth has been tracking version changes more extensively, and processes appear adequate to ensure listing all relevant changes to the RDUM in the version change log that appears in the manual. 	<ul style="list-style-type: none"> KCL indicated that computational instructions provided by BLS for 13 PMAP SQMs are inconsistent with the information provided in the SQM Georgia Performance Reports. 	<ul style="list-style-type: none"> N/A. 	
	<ul style="list-style-type: none"> KCL is reviewing BLS's amended response for Exception 89, regarding Metrics. 	<ul style="list-style-type: none"> KCL indicated that BLS's raw data used in the calculation of the BLS SQM reports are not accurately derived from or supported by their early-stage data. 	<ul style="list-style-type: none"> KCL's further activities will be based on its analysis of BLS's amended response. 	

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Ref	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> KCL expects to file a closure report for Exception 90, regarding Metrics, with the GPSC shortly. BLS provided a number of remedies to aid in the re-test. These included updates to its codes, clarifications to the <i>Raw Data Users' Manual</i>, and revisions to its SQM reports. Once the changes were made, KCL was able to replicate all three of the BLS reported SQMs exactly. KCL is reviewing BLS's amended response for Exception 92, regarding Metrics. The GPSC is reviewing a closure report for Exception 93, regarding Metrics. KCL continues to clarify a closure report for Exception 94, regarding Billing, based on GPSC comments. KCL expects to file Exception 95 (Amended), regarding Ordering and Provisioning, with the GPSC shortly. 	<ul style="list-style-type: none"> KCL indicated that it cannot replicate three of BLS's reported SQMs in the March 2000 performance measurement reports. KCL indicated that BLS's raw data, used in the calculation of BLS SQM reports, are not accurately derived from or supported by their component early-stage data. KCL indicated that it encountered ten Service Quality Measurements ("SQMs") for which there are inconsistencies among the statements of the definition, calculation and business rules sections in the <i>Service Quality Measurements Georgia Performance Reports (SQM Reports)</i>. KCL indicated that BLS failed to deliver 20% of expected resale DUF records to KCL. KCL indicated that BLS has delivered Firm Order Confirmations (FOCs) in response to Local Service Requests (LSRs) that should have received error messages. 	<ul style="list-style-type: none"> N/A. KCL's further activities will be based on its analysis of BLS's response. KCL expects to file this closure statement upon completion of the GPSC's review. After completion, KCL expects to re-submit this closure report to the GPSC. KCL's further activities will be based on BLS's response to the amendment.

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Ref	Item	Status	Issues	Next Step/Resolution
	<ul style="list-style-type: none"> KCL expects to file a closure report for Exception 96, regarding Maintenance and Repair, with the GPSC shortly. Given the relatively low rate of incidence of PBX troubles that could be reported using the ECTA Gateway, and the fact that alternative methods exist to report these troubles (BellSouth's TAFI interface or a call to a BellSouth Service Center), KCL concurs with the opinion of BellSouth that changes to the ECTA Gateway are not necessary at this time. In the absence of any other planned testing activity, KCL closes this exception for testing purposes. The GPSC is reviewing a closure report for Exception 97, regarding Ordering and Provisioning. KCL is reviewing BLS's amended response for Exception 98, regarding Ordering and Provisioning. KCL expects to file a closure report for Exception 101, regarding Metrics, with the GPSC shortly. The usage data in the updated BellSouth-provided data for April matched exactly the corresponding data collected by KCL. By repairing and re-running the macro for KCL, BellSouth addressed an issue that potentially could have affected the other CLECs' data as well. The BellSouth-provided raw data file for June 2000 likewise matched the KCL-collected data. Based upon the revised data, KCL's SQM value calculations matched exactly the revised BellSouth SQM reports for April 2000. Further, the KCL calculations of the three usage SQMs matched the BellSouth-reported values for June 2000. As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 101. KCL is reviewing a closure report for Exception 103, regarding Billing, internally. 		<ul style="list-style-type: none"> KCL indicated that the BLS ECTA Gateway does not allow CLECs to process trouble reports for PBX circuits in the state of Georgia. KCL indicated that BLS does not deliver timely Firm Order Confirmation (FOC) responses to non-flow through local service requests. KCL indicated that BLS does not deliver timely partially mechanized Clarification (CLR) responses. KCL indicated that BLS-reported raw data values in usage data delivered to the KCL Test CLEC, used in the calculation of three SQMs, do not match the KCL-collected values for April 2000. KCL indicated that it received invoices from BLS containing inaccurate information. 	<ul style="list-style-type: none"> N/A. KCL expects to file this closure statement upon completion of the GPSC's review. KCL's further activities will be based on its analysis of BLS's amended response. N/A. After internal review, KCL expects to submit this closure report to the GPSC.

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RCU	Item	Status	Issues	Next Step Resolution
		<ul style="list-style-type: none"> KCL is reviewing a closure report for Exception 105, regarding Metrics, internally. 	<ul style="list-style-type: none"> KCL indicated that computation instructions provided by BLS for Provisioning – Mean Held Order Interval and Distribution Intervals are inconsistent with the information provided in the SQM Reports. 	<ul style="list-style-type: none"> After internal review, KCL expects to submit this closure report to the GPSC.
		<ul style="list-style-type: none"> KCL continues to review a closure report for Exception 106, regarding Ordering and Provisioning, internally. 	<ul style="list-style-type: none"> KCL indicated that BLS failed to meet the agreed upon Frame Due Time (FDT) for six loop migrations. 	<ul style="list-style-type: none"> After internal review, KCL expects to submit this closure report to the GPSC.
		<ul style="list-style-type: none"> KCL is reviewing a closure report for Exception 107, regarding xDSL, internally. 	<ul style="list-style-type: none"> KCL indicated that parity does not exist between BLS's CLEC xDSL pre-ordering loop qualification process and its retail xDSL ordering process. 	<ul style="list-style-type: none"> After internal review, KCL expects to submit this closure report to the GPSC.
		<ul style="list-style-type: none"> KCL is drafting a closure report for Exception 108, regarding xDSL. 	<ul style="list-style-type: none"> KCL indicated that parity does not exist between BLS's CLEC xDSL ordering process and its retail xDSL ordering process. 	<ul style="list-style-type: none"> After internal review, KCL expects to submit this closure report to the GPSC.
		<ul style="list-style-type: none"> KCL is clarifying a closure report for Exception 110, regarding Metrics, based on GPSC comments. 	<ul style="list-style-type: none"> KCL indicated that it cannot replicate four of BLS's reported SQMs. 	<ul style="list-style-type: none"> KCL expects to re-submit the closure report to the GPSC upon the completion.
		<ul style="list-style-type: none"> The GPSC is reviewing a closure report for Exception 111, regarding Metrics. 	<ul style="list-style-type: none"> KCL indicated that it cannot replicate one of BLS's reported SQMs for the month of July 2000. 	<ul style="list-style-type: none"> KCL expects to file this closure statement upon completion of the GPSC's review.
		<ul style="list-style-type: none"> KCL continues to analyze re-test results related to Exception 112, regarding xDSL. 	<ul style="list-style-type: none"> KCL indicated that BLS does not have a process for returning acknowledgements or tracking manually-submitted Loop Make-up Service Inquiry pre-order queries or Local Service Request Service Inquiries. 	<ul style="list-style-type: none"> KCL expects to receive for further data from BLS to continue re-testing activities.
		<ul style="list-style-type: none"> KCL is reviewing BLS's amended response to Exception 113 (Amended), regarding Metrics. 	<ul style="list-style-type: none"> KCL indicated that BLS-reported raw data values for Completion Date and Commitment Date for the KCL Test CLEC do not match the KCL-collected values for certain Service Order numbers for six provisioning metrics. 	<ul style="list-style-type: none"> KCL's further activities will be based on its analysis of BLS's amended response.
		<ul style="list-style-type: none"> KCL expects to file Exception 114 (3rd Amended), regarding Ordering and Provisioning, with the GPSC shortly. 	<ul style="list-style-type: none"> KCL indicated that it encountered BLS provisioning errors for Resale orders. 	<ul style="list-style-type: none"> KCL's further activities will be based on its analysis of BLS's amended response.

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KCL	From	Status	Issues	Next Step Resolution
		<ul style="list-style-type: none"> KCL expects to file Exception 115 (Amended), regarding xDSL, with the GPSC shortly. 	<ul style="list-style-type: none"> KCL indicated that BLS does not respond to Loop Make-Up Service Inquiries within the specified seven-day interval. 	<ul style="list-style-type: none"> KCL's further activities will be based on BLS's response to the amendment.
		<ul style="list-style-type: none"> KCL expects to file Exception 116, regarding Pre-Ordering, with the GPSC shortly. 	<ul style="list-style-type: none"> KCL indicated that version 2.2.0.11 of BLS's TAG pre-order interface does not provide a Calculated Due Date (CDD) for UNE Loop-Port Combination service requests. 	<ul style="list-style-type: none"> KCL is assessing further activities based upon BLS's response to the exception.
		<ul style="list-style-type: none"> KCL expects to file Exception 117, regarding xDSL, with the GPSC shortly. 	<ul style="list-style-type: none"> KCL indicated that BLS did not provide a Clarification/Rejection response to a Loop Make-Up (LMU) Service Inquiry within the specified seven-day interval. 	<ul style="list-style-type: none"> KCL is assessing further activities based upon BLS's response to the exception.
		<ul style="list-style-type: none"> KCL expects to file Exception 118, regarding Ordering and Provisioning with the GPSC shortly. 	<ul style="list-style-type: none"> KCL indicated that it did not receive Completion Notices (CNs) within one business day of expected service completion. 	<ul style="list-style-type: none"> KCL is assessing further activities based upon BLS's response to the exception.
		<ul style="list-style-type: none"> KCL is reviewing BLS's response to a Draft Exception, regarding Metrics. 	<ul style="list-style-type: none"> KCL indicated that BLS-reported raw data values for Commitment Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for two Provisioning metrics. 	<ul style="list-style-type: none"> Based on BLS's response, KCL will file or withdraw this draft exception.
		<ul style="list-style-type: none"> KCL forwarded a Draft Exception, regarding Metrics, to BLS for its response. 	<ul style="list-style-type: none"> KCL indicated that BLS-reported raw data values for Completion Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for one provisioning metric. 	<ul style="list-style-type: none"> KCL is awaiting BLS's response. Based on BLS's response, KCL will file or withdraw this draft exception.
		<ul style="list-style-type: none"> KCL forwarded a Draft Exception, regarding xDSL, to BLS for its response. 	<ul style="list-style-type: none"> KCL indicated that BLS did not provide a Clarification/Rejection response to a manually-submitted Local Service Request / Service Inquiry (LSR/SI) within a seven-day interval. 	<ul style="list-style-type: none"> KCL is awaiting BLS's response. Based on BLS's response, KCL will file or withdraw this draft exception.

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Ref		Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> KCL is reviewing BLS's response to a Draft Exception, regarding Billing. 		<ul style="list-style-type: none"> BellSouth issued multiple bills that contained incorrectly rated and missing charges. 	<ul style="list-style-type: none"> KCL is awaiting BLS's response. Based on BLS's response, KCL will file or withdraw this draft exception.

¹ Referencing Methodology: An item referenced as I-n indicates that the item was first discussed in the July 22, 1999 status report. An item referenced as II-n indicates that the item was first referenced in the September 10, 1999 status report. An item referenced as III-n indicates that the item was first referenced in the October 21, 1999 report. An item referenced as IV-n indicates that the item was first referenced in the November 19, 1999 report. An item referenced as V-n indicates that the item was first referenced in the December 17, 1999 report. An item referenced as VI-n indicates that this item was first referenced in the January 28, 2000 report. An item referenced as VII-n indicates that this item was first referenced in the March 3, 2000 report. An item referenced as VIII-n indicates that this item was first referenced in the April 6, 2000 report. An item referenced as IX-n indicates that this item was first referenced in the May 12, 2000 report. An item referenced as X-n indicates that this item was first referenced in the June 9, 2000 report. An item referenced as XI-n indicates that this item was first referenced in the July 21, 2000 report. There have been no new items on the past three reports (September 15, 2000, November 1, 2000 and December 13, 2000).

² According to the exception process agreed to by KCL, BellSouth and the Georgia Public Service Commission, when KCL discovers a potential component defect (e.g., a deficiency in a procedure, system or document) written substantiation is submitted to BellSouth detailing KCL's findings. BellSouth provides a written response to this finding. KCL's written substantiation is considered a "Draft Exception" until the potential defect has been confirmed. If KCL's assessment of the potential error is determined to be inaccurate, KCL will withdraw the Draft Exception. If the issue is substantiated, the Draft Exception and BellSouth response will be submitted to and published by the Commission, and the parties will agree on resolution steps. A complete exception listing, including all exceptions, responses, amended responses and closure reports, may be found on the Georgia Public Service Commission's Web site at www.psc.state.ga.us.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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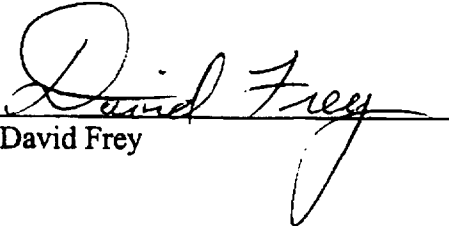
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DEC 14 2000

EXECUTIVE SECRETARY
G.P.S.C.

December 14, 2000

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

RE: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Docket No. 8354-U

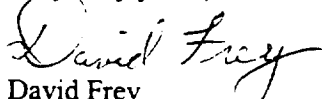
Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting LLC's Closure Reports for Exceptions 22, 46, 49, 52, 54, 73, 88, 90, 96 & 101.

We request that these documents be filed in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,


David Frey
Manager

Enclosures

cc: Parties of Record



CLOSURE REPORT FOR EXCEPTION 22

BellSouth Georgia OSS Testing Evaluation

Date: December 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth disconnected retail accounts on loop migration orders without re-connecting the UNE loop component.

Summary of Exception:

In response to two loop migration¹ local service requests (LSRs), KPMG Consulting LLC (KCL) received an error message indicating that the "Account is Final".

To process migration LSRs, BellSouth generates two internal service orders:

1. Disconnect Order;
2. New Connect Order.

Two migration service requests that contained errors were submitted via TAG. As a result of the errors in the LSRs, each dropped out for manual handling by BellSouth Local Carrier Service Center (LCSC) representatives. A Clarification (CLR) was transmitted back to KCL for each LSR. While KCL was investigating the error cause and preparing a supplemental service request based on the CLR, BellSouth order activity continued².

According to BellSouth, the LCSC representative canceled one of the two internal service orders, the New Connect Order, in each migration order. The corresponding Disconnect Order was allowed to proceed through the BellSouth service order processing systems.

As a result, BellSouth disconnected the end user's retail service without reconnecting their service with KCL. Since KCL's view of the LSR status indicated the orders were in erred status, supplemental service requests were issued. In response to these supplements, KCL received CLR messages stating that the customer accounts were "final," or disconnected.

¹ On a loop migration order, the CLEC requests end user conversion from BellSouth retail service to CLEC UNE service.

² Issuance of a CLR indicates that order processing cannot continue without further error-free information. Therefore, when a CLR has been transmitted to a CLEC on a service request, BellSouth service processing should cease.

CLOSURE REPORT FOR EXCEPTION 22

BellSouth Georgia OSS Testing Evaluation

Summary of BellSouth's Response:

"BellSouth modified logic in the Local Exchange Service Order Generator (LESOG) on February 12, 2000. With the change, all service orders mechanically generated will be mechanically cancelled if the orders encounter errors during the creation process. This modification will prevent the situation referenced in [this exception]."

Summary of KCL Re-test Activities:

KCL initiated a re-test on August 25, 2000 to evaluate the BellSouth system fix designed to prevent invalid orders from continuing through the provisioning process. Of the UNE Loop migration transactions submitted during re-testing, a total of 33 transactions received Clarifications, thereby replicating the error scenario which instigated the BellSouth fault documented in this Exception.

KCL Re-test Results:

None of KCL's service requests for UNE Loop migrations submitted during re-testing and falling into error status received a subsequent "Final Account" error message. Based on the absence of the "Final Account" error message in response to re-test orders, KCL finds no evidence of a continued BellSouth problem with disconnecting retail accounts of UNE Loop orders in error status.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 22.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 46

BellSouth Georgia OSS Testing Evaluation

Date: December 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

KPMG Consulting LLC (KCL) cannot replicate seven of BellSouth's reported Service Quality Measurements (SQMs).

Summary of Exception:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KCL is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To perform its calculations, KCL has relied on BellSouth's *PMAP Raw Data User Manual*², where applicable, and the corresponding raw data. Technical assistance³ has been provided by BellSouth, when necessary.

KCL has been unable to replicate the following SQM values:

1. **Percent Rejected Service Requests in the Ordering category for the KCL test CLEC (November 1999 and January 2000).** For each report (*Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized*), KCL was unable to replicate the values for the UNE and OTHER products using BellSouth's instructions.
2. **Reject Interval in the Ordering category for the KCL test CLEC (November 1999 and January 2000).** For each report (*Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized*), KCL was unable to replicate the values for the UNE and OTHER products using BellSouth's instructions.

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) web site.

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site.

³ "Technical Assistance" refers to any calculation instruction KCL may have received in the replication of CLEC aggregate or non-PMAP (manually calculated) metrics.

CLOSURE REPORT FOR EXCEPTION 46

BellSouth Georgia OSS Testing Evaluation

3. ***Firm Order Confirmation Timeliness (Non-Trunks) in the Ordering category for the KCL test CLEC (November 1999 and January 2000).*** For each report (*Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized*), KCL was unable to replicate the values for the UNE and OTHER products using BellSouth's instructions.
4. ***Order Completion Interval in the Provisioning category for the KCL test CLEC (November 1999, December 1999 and January 2000).*** For November 1999, KCL was unable to replicate the UNE Non-Design products for OCNs 9990 and 9991 using BellSouth's instructions. For December 1999, KCL was unable to replicate the Residence and UNE Design products for OCN 9991 using BellSouth's instructions. For January 2000, KCL was unable to replicate the UNE Non-Design product for OCN 9991 and 9994 using BellSouth's instructions.
5. ***Total Service Order Cycle Time⁴ in the Provisioning category for the KCL test CLEC (November 1999, December 1999 and January 2000).*** For the November 1999 *Fully Mechanized* report, KCL was unable to replicate the UNE Design product for OCN 9990 using BellSouth's instructions. For December 1999, KCL was unable to replicate each of the reports (*Fully Mechanized, Partially Mechanized, and Non-Mechanized*) using BellSouth instructions. For the January 1999 *Fully Mechanized* report, KCL was unable to replicate the UNE Non-Design product for OCN 9994 using BellSouth's instructions.
6. ***OSS Interface Availability⁴ in the Pre-Ordering and Maintenance and Repair Categories for the CLEC Aggregate (December 1999).*** KCL was unable to replicate two values from the BellSouth report, as shown in this table:

Category	KCL Calculations	BellSouth's Report
LEO Mainframe	Data not available ⁵	100.0000%
CLEC TAG System	99.9667%	99.9837%

Additionally, there were records in the data file for the CRLNOP1D and CRLNOP2D system that BellSouth did not include in its report.

7. ***Mean Time to Deliver Usage⁴ in the Billing category for the KCL test CLEC (November 1999).*** BellSouth weighted the record volume by adding 1.5 to the "Days Delayed," rather than the 0.5 indicated in their written instructions. Thus, the BellSouth calculated value is greater than the KCL-calculated value by 1. The resulting disparity is shown in this table:

⁴ BellSouth provided KCL with the raw data and technical instruction necessary to validate the calculations, since the information was not available via the PMAP site.

⁵ When BellSouth provided the raw data for this SQM, KCL was unable to identify any data relating to the LEO Mainframe.

CLOSURE REPORT FOR EXCEPTION 46

BellSouth Georgia OSS Testing Evaluation

Category	KCL Calculations	BellSouth's Report
Mean Time	4.55	5.55

Summary of BellSouth Response:

1. ***Percent Rejected Service Requests in the Ordering category for the KCL test CLEC (November 1999 and January 2000).***

"For Percent Rejected Service Requests in the Ordering Category, 'Combos' are included in the 'Other' category rather than 'UNE' or 'UNE Othe'. However, a change request is pending that would move the product 'Combos' from the 'Other' category to a separate category called 'Combos'. Business requirements are being developed and this change request will be prioritized with other pending changes."

2. ***Reject Interval in the Ordering category for the KCL test CLEC (November 1999 and January 2000).***

"For Reject Interval in the Ordering category, 'Combos' are included in the 'Other' category rather than 'UNE' or 'UNE Other'. However, a Change Request is pending that would move the product 'Combos' from the 'Other' category to a separate category called 'Combos'.

Although KCL replicated June reports for the test CLEC, KCL was unable to replicate the May report for the Test CLEC. This was due to the fact that BellSouth reran May's data 2 times. The 1st rerun was on June 14th because the PMAP production team did not originally migrate the ORNDDfLsrFatalRejects job into batch 60 which used the new table to identify fatal rejects. The 2nd rerun was on July 20th. The reason for the second rerun was to exclude the weekends and addition of the 36hr bucket."

3. ***Firm Order Confirmation Timeliness (Non-Trunks) in the Ordering category for the KCL test CLEC (November 1999 and January 2000).***

"'Combos' are included in the 'Other' category rather than 'UNE' or 'UNE Other'. However, a change request is pending that would move the product 'Combos' from the 'Other' category to a separate category called 'Combos'. Business requirements are being developed and this change request will be prioritized with other pending changes."

CLOSURE REPORT FOR EXCEPTION 46BellSouth Georgia OSS Testing Evaluation

4. Order Completion Interval in the Provisioning category for the KCL test CLEC (November 1999, December 1999 and January 2000).

"BellSouth agrees that using the Version 2.0 of the Raw Data Users Manual, KCL was unable to replicate for the test CLEC the following data: for November 1999, the UNE Non-Design products for OCNs 9990 and 9991, for December 1999, the Residence and UNE Design products for OCN 9991, and for January 2000, the UNE Non-Design product for OCN 9991 and 9994.

The instructions to create a report using the exclusion "so_cmtt_cd = 'L'" would not yield results identical to the SQM reports. The SQM report performs additional exclusions, permitting supplementary 'L' orders into the final report. Specifically, 'L' orders with commitment dates from prior months are not being excluded.

BellSouth issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" that was effective for March data, published in April. This change enabled the monthly reports to match results created using the Raw Data Users Manual.

BellSouth provided KCL with the April OCI data and reports. The discrepancies identified by KCL in the April Average Completion Interval and Order Completion Interval reports are explained by differences in the functionality of KCL and BellSouth's tools used to replicate the reports from Raw Data.

Step 2 Bullet 2 of the Raw Data User's Guide (RDUG) currently instructs the user to "Exclude records where SO_CMTT_CD = 'L'." This statement was changed to read "Exclude records where SO_CMTT_CD = 'L' or SO_CMTT_CD is null" in the September 2000 release of the RDUG. The reason that BellSouth and KCL were calculating different values from the raw data is because the aforementioned exclusions are handled identically using SQL to query the Oracle database. If one excludes records with a certain value in a field, then records with null values in that field are also excluded.

However, using KCL's tool, the above statements are not identical. If records are excluded with a certain value in a field, then all other values are considered valid, including null values. Records with null values are not valid for the Order Completion Interval metric is because these are "listing" records, where no work has been performed. Change request 5923 was implemented to filter these records in the PMAP system beginning with June Data.

In the Raw Data User's Guide (RDUG), the Order Completion Interval and Order Completion Interval Trunks instructions were changed to ensure that a null value in the SO_CMTT_CD field would cause that record to be excluded from the selection process.

CLOSURE REPORT FOR EXCEPTION 46BellSouth Georgia OSS Testing Evaluation

Change request 5923 prescribed a code change which prevents these listing orders from entering the PMAP Normalized Operational Data Store (NODS). Since there was no work performed on them, these are not valid provisioning orders. Beginning with June Data, posted in July, these orders are absent from NODS and raw data. If a CLEC attempts to replicate raw data before June, the additional exclusion of records where "SO_CMTT_CD is null" will allow this. For data later than May, this exclusion will no longer exclude any orders since they will have already been removed due to the code fix resulting from Change Request 5923."

5. **Total Service Order Cycle Time⁶ in the Provisioning category for the KCL test CLEC (November 1999, December 1999 and January 2000).**

"BellSouth agrees that using Version 2.0 of the Raw Data Users Manual KCL was unable to replicate for the KCL test CLEC the following reports: for November 1999 *Fully Mechanized* report, the UNE Design products for OCNs 9990, for December 1999, each of the reports (*Fully Mechanized, Partially Mechanized, and Non-Mechanized*), and for January 2000 *Fully Mechanized* report, the UNE Non-Design products for OCN 9994.

BellSouth, using the Version 2.04 of the Raw Data Users manual, was able to replicate the data in question for November 1999, December 1999, and January 2000 using additional steps. The instructions to perform the data replication, specifically the exclusion of records where 'so_cmtt_cd = null', the grouping by fields to eliminate duplicate records needs some additional clarification. In November, only data that was for Mechanized orders (MECHZTN = 'Mechanized') was used to calculate the Average Total Service Order Cycle Time.

In December, again grouping by fields to eliminate duplicates results in the MECHZTN field return results for each of the data categories. For the January 2000 *Fully Mechanized* report, the only Fully Mechanized record returned belongs to OCN 4361. The raw data matched the end report because no fully mechanized UNE Non-Design products were reported for OCN 9994.

KCL reported on 6/8/00 that they could now replicate the data in question for November 1999, December 1999, and January 2000. The Raw Data Users Manual was updated in May reflecting these changes and additional process steps. The Raw Data Users was posted to the web site on June 9th, 2000 and a copy was delivered to KCL representatives."

⁶ BellSouth provided KCL with the raw data and technical instruction necessary to validate the calculations, since the information was not available via the PMAP site.

CLOSURE REPORT FOR EXCEPTION 46**BellSouth Georgia OSS Testing Evaluation**

6. *OSS Interface Availability³ in the Pre-Ordering and Maintenance and Repair Categories for the CLEC Aggregate (December 1999).*

"KCL has been able to replicate OSS Interface Availability in the Pre-Ordering and Maintenance & Repair Categories.

- BellSouth informed KCL where to locate the data for LEO Mainframe (KCL stated data was not available). KCL was able to match BellSouth's reported number.
- KCL issued a corrected Exception No. 55. KCL inadvertently transposed BellSouth's reported number with KCL's calculated number for CLEC TAG system. However, after further clarification from BellSouth, KCL was able to match BellSouth's reported number for CLEC TAG system.

OSS Applications consist of various servers. Some servers have a single function while others have multiple functions. Both servers in questions, CRLNOP1D and CRLNOP2D, provide LNP Gateway data only. One is the primary service while the second is used as a backup in case there is a failure in the first server. When users log onto the system, they are authenticated and allowed access to the LNP Gateway. Separate servers report LNP data for the Maintenance and Repair OSS Interface Availability Report, but no data is currently reported from the LNP Gateway Servers."

7. *Mean Time to Delivery Usage Records in the Billing category for the KCL test CLEC (November 1999).*

"The weighting applied to this measure is in a spreadsheet which is used by an Ardent job as a lookup table. The table has been changed to provide the correct lookup for each interval by adding .5 rather than 1.5 to each interval. This change was implemented 1/17/00 and would have been apparent with February reports."

Summary of KCL Re-Test Activities (by Issue Number):**1. Percent Rejected Service Requests in the Ordering category for the KCL test CLEC (November 1999 and January 2000).**

Based upon BellSouth's responses, KCL revised its computer programs to map the "Combos" products to the "Other" category. KCL then compared its calculations using these new instructions to the BellSouth report originally provided. KCL has used these new instructions consistently for all months since the November report, for calculation verification purposes. (KCL reviews the KCL Test CLEC reports for every month as a part of its regular testing activities.) KCL also examined all recent reports for evidence of the aforementioned change request creating the new report category "Combos."

CLOSURE REPORT FOR EXCEPTION 46BellSouth Georgia OSS Testing Evaluation

2. *Reject Interval in the Ordering category for the KCL test CLEC (November 1999 and January 2000).*

Based upon BellSouth's responses, KCL revised its computer programs to map the "Combos" products to the "Other" category. KCL then compared its calculations using these new instructions to the BellSouth report originally provided. KCL has used these new instructions consistently for all months since the November report, for calculation verification purposes. (KCL reviews the KCL Test CLEC reports for every month as a part of its regular testing activities.) KCL also examined all recent reports for evidence of the aforementioned change request creating the new report category "Combos."

3. *Firm Order Confirmation Timeliness (Non-Trunks) in the Ordering category for the KCL test CLEC (November 1999 and January 2000).*

Based upon BellSouth's responses, KCL revised its computer programs to map the "Combos" products to the "Other" category. KCL then compared its calculations using these new instructions to the BellSouth report originally provided. KCL has used this new instruction consistently for all months since the November report, for calculation verification purposes. (KCL reviews the KCL Test CLEC reports for every month as a part of its regular testing activities.) KCL also examined all recent reports for evidence of the aforementioned change request creating the new report category "Combos."

4. *Order Completion Interval in the Provisioning category for the KCL test CLEC (November 1999, December 1999 and January 2000).*

Based upon BellSouth's response that its SQM reports prior to that for March 2000 did not properly exclude records where the *so_cmtt_cd* field is equal to "L," KCL reviewed all of the reports beginning with March 2000, and compared the BellSouth-reported values with the KCL-calculated values. In addition, KCL also revised its computer programs to incorporate the revisions BellSouth made to the calculation instructions – that is, to exclude records where the *so_cmtt_cd* field is "null."

5. *Total Service Order Cycle Time in the Provisioning category for the KCL test CLEC (November 1999, December 1999 and January 2000).*

Based upon BellSouth's response, KCL revised its computer programs to incorporate the instructions found in the May version of the *Raw Data User Manual*. KCL then compared the recalculated values with the BellSouth-reported values. KCL has used the new instruction consistently for all months for calculation verification purposes. (KCL reviews the KCL Test CLEC reports for every month as a part of its regular testing activities.)

CLOSURE REPORT FOR EXCEPTION 46**BellSouth Georgia OSS Testing Evaluation**

6. OSS Interface Availability in the Pre-Ordering and Maintenance and Repair Categories for the CLEC Aggregate (December 1999).

Based upon BellSouth's responses, KCL revised its calculation of the SQM values. KCL then compared its revised calculations using these new instructions to the BellSouth report originally provided.

7. Mean Time to Deliver Usage Records in the Billing category for the KCL test CLEC (November 1999).

Based upon BellSouth's responses, KCL requested and received the revised report from BellSouth. KCL then compared the values in this revised report to the original KCL calculations. Additionally, KCL reviewed all the KCL Test CLEC SQM reports since December, particularly the reports since the Change Request was implemented on 1/17/00 (i.e., the reports for February through August).

KCL Re-Test Results (by Issue Number):

1. Percent Rejected Service Requests in the Ordering category for the KCL test CLEC (November 1999 and January 2000).

When KCL followed BellSouth's revised instructions indicating that the "Combos" product should be mapped to the "OTHER" category, all of the KCL-calculated values matched the BellSouth-reported values. Additionally, the KCL-calculated values and the BellSouth-reported values have matched exactly for the SQM reports issued since January 2000.⁷

BellSouth has not implemented its Change Request to create a separate "Combos" category, as of the August SQM reports.

2. Reject Interval in the Ordering category for the KCL Test CLEC (November 1999 and January 2000).

When KCL followed BellSouth's revised instructions indicating that the "Combos" product should be mapped to the "OTHER" category, all of the KCL-calculated values matched the BellSouth-reported values.

⁷ At the time this document was written, BellSouth had not yet implemented its Change Request to create a separate "Combos" category. However, KCL does not view the absence of such implementation as integral to the resolution of this exception.

CLOSURE REPORT FOR EXCEPTION 46**BellSouth Georgia OSS Testing Evaluation**

Additionally, the KCL-calculated values and the BellSouth-reported values have matched exactly for the SQM reports issued since January 2000, except for those reported in May 2000. While KCL was not able to match the reported values for May 2000, all of the KCL-calculated values have matched the BellSouth-reported values for all SQM reports issued subsequent to May 2000.⁷

3. Firm Order Confirmation Timeliness (Non-Trunks) in the Ordering category for the KCL Test CLEC (November 1999 and January 2000).

When KCL followed BellSouth's revised instructions indicating that the "Combos" product should be mapped to the "OTHER" category, all of the KCL-calculated values matched the BellSouth-reported values.

The KCL-calculated values and the BellSouth-reported values did not match for the SQM reports from February through June 2000, due to issues unrelated to the mapping of the "Combos." (See Exceptions 62, 90, and 110 for additional information.) These issues have now been resolved, and KCL has matched the KCL-calculated values and the BellSouth-reported values for the months of July and August 2000.⁷

4. Order Completion Interval in the Provisioning category for the KCL Test CLEC (November 1999, December 1999 and January 2000).

As stated above, BellSouth asked KCL to review the reports beginning with that for March 2000. KCL had already calculated values for February 2000, and noted discrepancies in Exception 62.

The KCL-calculated values did not match the values BellSouth initially reported for March 2000. However, BellSouth updated its code to exclude the records where the *so_cmtt_cd* field had a value of "L," and re-ran the March report. As a result, the KCL-calculated values matched the revised BellSouth-reported values.

As noted in BellSouth's response above, the *Raw Data User Manual* did not indicate that all records with the *so_cmtt_cd* field having a null value should be removed from the calculation. Based upon this missing instruction, KCL was initially unable to replicate the April SQM report. However, the manual has now been updated, and these records are also eliminated prior to the creation of the raw data. KCL re-

⁷ At the time this document was written, BellSouth had not yet implemented its Change Request to create a separate "Combos" category. However, KCL does not view the absence of such implementation as integral to the resolution of this exception.

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BellSouth Georgia OSS Testing Evaluation

calculated its values for April 2000. These recalculated values matched the originally reported BellSouth values, exactly.

Additionally, KCL has matched the BellSouth-reported values for all SQM reports since May 2000.

5. *Total Service Order Cycle Time in the Provisioning category for the KCL test CLEC (November 1999, December 1999 and January 2000).*

When KCL implemented the instructions found in the May version of the *Raw Data User Manual*, the resulting calculated values matched the BellSouth-reported values. Further, the values KCL calculated for this SQM subsequent to those posted in the January report match those reported by BellSouth. Note that BellSouth had removed the new instruction from the August *Raw Data User Manual*, resulting in KCL being unable to match its calculations to the BellSouth SQM report for July 2000. However BellSouth has updated the *Raw Data User Manual* (see the October 2000 version) with this instruction once again. (See Exception 111 for additional information.)

6. *OSS Interface Availability in the Pre-Ordering and Maintenance and Repair Categories for the CLEC Aggregate (December 1999).*

KCL followed BellSouth's revised instructions indicating which were the appropriate data to be mapped to the LEO mainframe category, and how to calculate the value for the CLEC TAG system category. All of the revised KCL-calculated values matched the original BellSouth-reported values, exactly.

7. *Mean Time to Deliver Usage Records in the Billing category for the KCL test CLEC (November 1999).*

The BellSouth-reported value in the revised SQM report matches the KCL-calculated value. Further, the values KCL calculated for the reports beginning with the February SQM report match those reported by BellSouth.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 46.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 46.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 49

BellSouth Georgia OSS Testing Evaluation

Date: December 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth did not provide an accurate and timely update to CLECs when implementing a Universal Service Order Code (USOC) change.

During resale functional testing, KPMG Consulting LLC (KCL) received the following error message in response to a Local Service Request (LSR): 'CO0VJ7L2 FORMAT SAE 536 II ESXDC¹'. KCL was unable to determine the nature of this error message by reviewing ordering documentation available to CLECs.

To further research this error message, KCL contacted its assigned BellSouth Customer Service Manager (CSM). The CSM referenced a letter sent to the Local Carrier Service Center (LCSC) on March 15, 2000. This letter announced the following change: 'N1ACR is a new USOC to be used in place of NXMCR² and ESXDC. NCACR is used if customer has GCJ³.'

Neither the letter sent to the LCSC nor the information contained therein was released to the CLECs. Additionally, no updates to BellSouth's ordering documentation reflecting this change were announced or implemented.

BellSouth Response

The CLEC USOC Manual (Product Catalog) receives feeds from eight different sources on the first of each month. An updated CLEC USOC Manual (Product Catalog) is published on the BellSouth web site for CLECs the end of the next month. For example, the feeds that were forwarded up to March 1 were posted to the web on April 28th.

The process for updating the CLEC USOC Manual is a labor intensive, non-mechanized process. The USOCs NXMCR and ESXDC will not be deleted from the database until the May, 2000 update of the CLEC USOC Manual.

¹ Call Waiting, per line, deluxe, with conferencing – See *General Services Tariff, Section A13*

² Caller ID, per line, deluxe – See *General Services Tariff, Section A13*

³ Call Forwarding Don't Answer – See *General Services Tariff, Section A13*

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BellSouth is in the process of assessing the effort, costs and resources required to mechanize this process to provide more timely updates to the USOC manual.

Additional BellSouth Response

BellSouth will utilize the carrier notification process to provide monthly notice of new and obsolete USOCs that may be submitted by a CLEC ordering local service.

Carrier notification will be published monthly on the BellSouth web site beginning 8/28/00. The carrier notification will include the following information:

- USOC
- English translation
- Tariff reference
- Estimated tariff date
- Estimated implementation date

Summary of KCL Re-test Activities:

KCL's retest activities consisted of evaluating BellSouth's utilization of the Carrier Notification Process to provide CLECs with information regarding changes to USOCs on a monthly basis. This process was put into effect on August 28, 2000.

During the course of additional testing, KCL did not observe implementation of additional USOC changes.

KCL Results:

Based on KCL's review of the Carrier Notification Process, KCL concludes that BellSouth's updated carrier notification methods and procedures, including prior notification of changes to USOCs (inclusive of effective date of change and tariff reference), should adequately address the issue identified in the exception report.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 49.

Attachments: None.

**CLOSURE REPORT FOR EXCEPTION 52**

BellSouth Georgia OSS Testing Evaluation

Date: December 14, 2000

EXCEPTION CLOSURE REPORT**Exception:**

KPMG Consulting LLC (KCL) cannot replicate twelve of BellSouth's reported Service Quality Measurements (SQMs).

Summary of Exception:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KCL is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). For this purpose, KCL has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance³ from BellSouth.

KCL has been unable to replicate report values for the following SQMs for the month of October 1999:

1. ***Coordinated Customer Conversions in the Provisioning category for the CLEC Aggregate.*** KCL was unable to replicate the following values in the BellSouth SQM report:

Category	KCL Calculations	BellSouth's Report
Without Number Portability; Count <=5	1888	1880
Without Number Portability; % <=5	81.48 %	81.14 %

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the *PMAP Raw Data User Manual* and the corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The *PMAP Raw Data User Manual* is posted and updated on the PMAP site.

³ "Technical Assistance" refers to any calculation instruction KCL may have received in the replication of CLEC aggregate or non-PMAP (manually calculated) metrics.

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Without Number Portability; Count >15	114	122
Without Number Portability; % >15	4.92 %	5.27 %
Without Number Portability; Total Minutes	9369	9969
Without Number Portability; Average Interval (Min)	4.0	4.3

2. **Timeliness in the E911 category for the combined CLEC Aggregate and BellSouth Retail.** KCL was unable to replicate the following values in the BellSouth SQM report:

Category	KCL Calculations	BellSouth's Report
Percent answered 0-4 hours	82.94%	82.45%
Percent answered 4-8 hours	1.41%	3.08%
Percent answered 8-12 hours	2.53%	4.10%
Percent answered 12-16 hours	3.13%	1.27%
Percent answered 16-20 hours	2.44%	4.28%
Percent answered 20-24 hours	2.87%	1.33%
Percent answered 24+ hours	4.69%	3.50%

3. **Mean Interval in the E911 category for the combined CLEC Aggregate and BellSouth Retail.** KCL was unable to replicate the Mean Interval Duration in the BellSouth SQM report:

Category	KCL Calculations	BellSouth's Report
Mean Interval Duration	0.03	3.81

4. **Percent Rejected Service Requests in the Ordering category for the CLEC Aggregate.** KCL was unable to replicate the BellSouth-reported SQM values for the Non-Mechanized report, using BellSouth's instructions.

Category	KCL Calculations	BellSouth's Report
Product = Special; Product Specific % Rejected	0.331	0.329
Product = Special; Product Specific % Rejected	0.144	0.142

5. **Reject Interval in the Ordering category for the CLEC Aggregate.**

CLOSURE REPORT FOR EXCEPTION 52

BellSouth Georgia OSS Testing Evaluation

For several reports (*Partially Mechanized, Total Mechanized, and Non-Mechanized*), KCL was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.

6. **FOC Timeliness in the Ordering category for the CLEC Aggregate.**
For each report (*Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized*), KCL was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.
7. **Mean Held Order Interval and Distributions Interval in the Provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the Provisioning trunks category for the CLEC Aggregate.** KCL was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.
8. **Usage Data Delivery Completeness in the Billing category for the CLEC Aggregate and BellSouth Retail.** KCL was unable to replicate the BellSouth reported "Day >30 Cumulative % Completeness Benchmark" value. BellSouth reports a rounded value of 1, although there are usage data records delivered after 30 days.

Category	KCL Calculations	BellSouth's Report
Day >30 Cumulative % Completeness Benchmark (CLEC Aggregate)	0.9974825	1
Day >30 Cumulative % Completeness Benchmark (BellSouth Retail)	0.9978706	1

9. **Mean Time to Deliver Usage in the Billing category for the CLEC Aggregate and BellSouth Retail.** BellSouth weighted the record volume by adding 1.5 to the "Days Delayed," rather than the 0.5 indicated in their written instructions. Thus, the BellSouth calculated value is greater than the KCL-calculated value by 1.

Category	KCL Calculations	BellSouth's Report
Mean Time (CLEC Aggregate)	3.64	4.64
Mean Time (BellSouth Retail)	2.42	3.42

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10. **Usage Data Delivery Accuracy in the Billing category for the CLEC Aggregate.**
KCL was unable to replicate the BellSouth reported 'Total Data Packs Sent' value.

Category	KCL Calculations	BellSouth's Report
Total Data Packs Sent	5012	5024

11. **Invoice Accuracy in the Billing category for the CLEC Aggregate.**
KCL was unable to replicate any of the BellSouth reported SQM values.

12. **Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate.**
KCL was unable to replicate the BellSouth reported "Mean Time to Deliver CABS Bills" value for the Interconnection type of service.

Category	KCL Calculations	BellSouth's Report
Mean Time to Deliver CABS Bills -cal day; Interconnection	5.74	5.66

Summary of BellSouth's Response:

1. **Coordinated Customer Conversions in the Provisioning category for the CLEC Aggregate.**

"The reason for the difference between the BellSouth report values and the KCL report values is because of different calculation methods.

BellSouth calculation for the "avg." cut minutes per item is derived using the following:

$$\text{avg. (cut time per item)} = (\text{cut comp} - \text{cut start}) / \# \text{ items}$$

KCL derived this by using the following:

$$\text{avg. (cut time per item)} = \text{cut min} / \# \text{ items}$$

The file that was used for generating the PMAP report for October 1999 contained manually calculated cut minutes. There were some errors in these calculations but the errors were of no consequence because the cut minutes were not used by the formula to calculate the CCC report. (There is a BellSouth group that uses cut minutes data for other reports.) These miscalculations in the cut minutes were discovered and beginning in November 1999 the cut minutes were calculated mechanically. The formula for calculating the cut minutes was applied to the October file which was

inadvertently sent to KCL instead of the original raw data file that was sent to the PMAP databases used calculating the CCC report. Also, when the cut complete and cut start times are the same the cut minutes are defaulted to 1 (one) minute when preparing the raw data file. When the PMAP databases calculate the cut minutes, the actual value is used in these cases instead of a default value. Both files used by KCL and the original raw data file for October is available for re-testing as required.”

2. *Timeliness* in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

“The values found in the October SQM are correct. The instructions provided to KCL lacked the specificity to permit KCL to replicate the data. BellSouth has revised the instructions to be more specific and corrected one calculation. As a result, KCL was able to replicate the Timeliness values in the E911 category for the October 1999.”

3. *Mean Interval* in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

“KCL should follow the revised method included in Item No. 3 of BellSouth’s instructions. By doing so, KCL should be able to replicate the Mean Interval Duration found in BellSouth’s October 1999 report.

Updated instructions were sent to KCL for review in calculation of data. As of 5/02/00 KCL advised BellSouth that they were unable to replicate the October 1999 E911 Mean Interval of 3.81. KCL’s derived number was 3.819. BellSouth’s Application Developer revised the narrative of PMAP’s E911 Duration Calculation Procedure and sent this to KCL on 5/9/00. KCL reported on 5/10/00 that they were able to replicate the BellSouth reported value for Mean Interval Duration for this SQM.

BellSouth has updated its instructions available to CLECs to reflect the information provided to KCL. BellSouth does not provide Raw Data to the CLECs for *Mean Interval in the E911* categories and does not provide instructions to the CLECs.”

4. *Percent Rejected Service Requests* in the Ordering category for the CLEC Aggregate.

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BellSouth agrees with KCL that they were unable to replicate the BellSouth reported SQM values for *Percent Rejected Service Request* for the Non-Mechanized report for the CLEC Aggregate for October 1999.

BellSouth discovered that there were reject count errors in the October raw data. PMAP coding changes implemented in November affecting LSRs received will not allow BellSouth to replicate the exclusions for October data. The February version of the Raw Data Users Manual will allow KCL to replicate data from December 1999 through March 2000. The following changes are important if KCL desires to review additional months for data validation for this metric. A PMAP coding change request (Issue Tracker # 5705) implemented in April 2000 modified the SQM report to exclude LSRs cancelled prior to being rejected. The Raw Data Users Manual is being updated to reflect this information. A PMAP coding change request (Issue Tracker # 5542) has been issued to modify PMAP reports to reflect the new LCSC hours of operation. This coding change was implemented for May data in June 2000. The Raw Data Users Manual was updated to reflect this information.

The Ordering Reports for May were rerun because, prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on weekends continued to be excluded. The correction was made to include LSRs received and/or processed on weekends prior to posting the June reports. BellSouth did not rerun the May reports until July 27, however the June 2000 *Percent Rejected Service Request* Report was correct when it was posted and available for validation prior to the rerun of the May report.

Originally, BellSouth had offered KCL the May 2000 Report but because June 2000 was already available, BellSouth requested that KCL retest for replication with the June 2000 *Percent Rejected Service Request* Report. KCL reported on 8/21/00 that they were able to replicate June 2000 for the CLEC Aggregate for the *Percent Rejected Service Request* Report.”

5. *Reject Interval* in the Ordering category for the CLEC Aggregate.

“The values found in the October 1999 SQM are correct. Using the February version of the Raw Data Users Manual, KCL was able to replicate the reported SQM values.

BellSouth provided KCL with sample queries and as a result, KCL was able to replicate the *Reject Interval* for the CLEC Aggregate data for October 1999.”

6. *FOC Timeliness* in the Ordering category for the CLEC Aggregate.

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"BellSouth agrees that KCL was unable to replicate the BellSouth reported SQM for *FOC Timeliness* for the CLEC Aggregate for October 1999. Upon further investigation, BellSouth identified a problem in the interval 'buckets'. The difference between KCL's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (orders confirmed) in the 15th minute. KCL was putting those LSRs in the 15-30 minute 'bucket' while PMAP was including them in the 0-15 minute 'bucket'.

As a result of this KCL draft exception, System Change Request 5848 was opened to clarify the bucket definitions and was effective for May data that was published in June. An interval chart for CR 5848 is shown below. The Raw Data Users Manual was updated in May, reflecting these changes.

The *FOC Timeliness* for the May report had to be rerun because prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on weekends continued to be excluded. The code was corrected and the report was rerun on July 27. Notification that May Ordering Reports had been rerun was posted to the Web on August 1, 2000. The July SQM further clarified the bucketization issue. BellSouth has provided KCL with *FOC Timeliness* data for May and June 2000 for retesting.

KCL should be able to replicate the most recent June *FOC Timeliness* Report which was sent to them on 8/22/00. The raw data is correct and has not changed. However, on the report that KCL attempted to replicate initially, records were placed into 'buckets' based on different interval values than those defined in the SQM and displayed on the reports. The changes, which were made in May, were inadvertently dropped in June but have now been corrected permanently.

As a result of this situation, BellSouth requested that KCL review July data for *FOC Timeliness*. KCL reported on 9/7/00 that they were able to replicate *FOC Timeliness* for the CLEC Aggregate."

Change Request 5848 corrected the "Mechanized" FOC interval buckets as shown:

0 - <15 min	12 - <16 hrs
15 - <30 min	16 - <20 hrs
30 - <45 min	20 - <24 hrs
45 - <60 min	24 - <48 hrs
60 - <90 min	>= 48 hrs
90 - <120 min	
120 - <240 min	

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4 - <8 hrs
8 - <12 hrs

7. *Mean Held Order Interval and Distributions Interval* in the Provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the Provisioning trunks category for the CLEC Aggregate.

The instructions in the Raw Data User Manual were corrected in the 2.0.7 version dated 07/26/00, with multiple changes to further clarify the instructions for *Mean Held Order Interval*. This is an update to previous instructions provided to KCL.

Also, prior to December 1999, a section of the Ardent DataStage code that is used to create Held Order and Held Order Trunking reports was incorrect. This was explained in the initial set of instructions. A correction was made to the code that changed the assignment of the synthetic key by ordering the loading of the table by CMTT_DATE ascending. This change made the minimum CMTT_DATE correspond to the minimum SO_CMTT HIST_ID and so forth so that the final and first commitments selected would be the final and first CMTT_DATE. Due to the nature of this error, the October 1999 Held Order and Held Order Trunking raw data cannot be used to replicate the end report.

A change request (CR 6070) was entered into issue tracker to make a correction to the Ardent code to exclude orders in 'CP', PC, CA status and to only include orders where CMPLTN_DT is null. This was effective with the July data for August 15th reports. Ardent DataStage code was corrected as stated above in CR 6070.

KCL should use July data to replicate *Mean Held Order Interval and Distributions Interval* for non-trunks. BellSouth provided KCL with July data for trunks and non-trunks. There have been no held orders for trunk orders from December 1999 through September 2000.

BellSouth was able to replicate the July Held Order Interval and Mean report using the following changes to the Raw Data Users Guide:

The text '**Include records where so_cmmt_cd field contains W, X, F, L, M or blank.**' was removed from the Raw Data User's Guide (RDUG). A new step #8 was created between step #7 and old step #8 with the addition of the text '**Include records where so_cmmt_cd field contains W, X, F, L, or M**'. The so_cmmt_cd field is only valid for the original commitment on an order, and not for subsequent commitments, and should therefore only be applied to the step in the RDUG that selects the minimum so_cmmt_hist_id.

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Additionally, bullet points were added to step #7 and new step #8 that decrease the size of record sets that need to be compared to finish recreating the measure.”

8. Usage Data Delivery Completeness in the Billing category for the CLEC Aggregate and BellSouth Retail.

“The PMAP reports for BellSouth ‘Day >30 Cumulative % Completeness Benchmark (CLEC Aggregate) & Day >30 Cumulative % Completeness Benchmark (BellSouth Retail)’ show the same results for OCT 1999 as KCL. There was a programming problem that was corrected in PMAP, Issue Tracker #5584 on Feb 18, 2000. This report has been re-run, verified to match, and resent to KCL on 6/5/00. The file used by KCL is available for retesting as required.”

9. Mean Time to Deliver Usage in the Billing category for the CLEC Aggregate and BellSouth Retail.

There was a programming problem in PMAP that has been corrected.

The BellSouth team has researched these issues and they are now corrected as of 2/2/00.

The weighting that is currently applied to this measure in an Excel spreadsheet is used by an Ardent job as a lookup table. The Excel table has been changed to provide the correct lookup for each interval by adding .5 rather than 1.5 to each interval. This was change request 5419. This report has been re-run, verified to match, and resent to KCL on 6/5/00.”

10. Usage Data Delivery Accuracy in the Billing category for the CLEC Aggregate.

“The OCN/ACNA files used by PMAP for mapping the CLEC is a manual process. There were OCNs provided in the Billing data that were not included in the OCN/ACNA mapping file for PMAP. The data associated with these OCNs represent the difference in the KCL & BellSouth reports. The PMAP group must manually update the OCN/ACNA tables to coincide with the CLECs OCN/ACNA value reflected on the individual accounts. A process for automating this function has been addressed by the PMAP group.

BellSouth has provided KCL with an electronic copy of the NODS_RQ Company file for October 1999 on 6/22/00. KCL was able to replicate the BellSouth ‘Total Data Packs Sent’ value for October 1999.”

11. Invoice Accuracy in the Billing category for the CLEC Aggregate.

For Invoice Accuracy in the Billing Category for the CLEC Aggregate KCL compared their calculations to the PMAP results. BellSouth used KCL's comparisons to evaluate why the replication cannot be done on this measure. BellSouth evaluation of the data reveals that there are some OCNs and ACNAs on the BBI data that KCL didn't include. Those OCNs / ACNAs that are not in KCL's data are also the same ones that are not on the CLECID file in their comparison. If those OCNs / ACNAs were added into KCL's data, the KCL and PMAP Billing data figures would be the same. After review of the PMAP revenue amounts (and excluding the revenue amounts without OCN / ACNAs values in PMAP), the difference is that PMAP used the absolute value of the total billed revenue for UNE and Interconnection.

On 6/22/00 KCL requested a copy of the rerun results for October 99 data for Invoice Accuracy. BellSouth has provided KCL with an electronic copy of the NODS_RQ Company file for October 1999 on 6/22/00.

The differences in the data that Billing reported versus the figures that PMAP reported were due to PMAP handling of the negative revenues and the fact that the October 1999 NODS_RQ Company file did not include some of the test accounts or ICOs. If KCL excludes the fall out of the test accounts and ICOs from the totals, the results would be the same as reported in PMAP. In summary, if 'fallout' from PMAP is determined to be 'BST test data' or BST accounts that have not been identified as a valid CLEC, PMAP will exclude it from the final reports.

A correction to NODS_RQ Company was made to make OCN 2834 an active (unexpired) code. The May 2000 CLEC Resale Invoice Accuracy report was rerun and the corrected version posted to the web. With this correction, revenue of \$60,554.54 and an adjustment of \$132.91 are included in the CLEC Resale values. In addition, the combined revenue for ACNAs ZZR and ZZS (\$2,892) continues to be correctly excluded from the CLEC Interconnection revenue total. With the inclusion of values for OCN 2834 and the exclusion of values for ZZR and ZZS, the report now matches the values shown in the calculations provided by KCL on 8/28/00."

12. Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate.

"The OCN/ACNA files used by PMAP for mapping the CLEC is a manual process. There were ACNAs provided in the Billing data that were not included in the OCN/ACNA mapping file for PMAP. The data associated with these ACNAs represent the difference in the KCL & BellSouth PMAP reports. The PMAP group must manually update the OCN/ACNA tables to coincide with the CLECs OCN/ACNA value reflected on the individual accounts. A process for automating this function has been addressed by the PMAP group.

The *Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate* report was rerun for October 1999 after the 2 ACNAs/OCNs into the NODS_RQ Company file for October 1999. The report was provided to KCL on 6/22/00. KCL verified that the *Mean Time to Deliver CABS Bills* value for the Interconnection type of service matched the BellSouth reported value.

A correction to NODS_RQ Company was made to make OCN 2834 an active (unexpired) code. The May 2000 Mean Time To Deliver Invoice report was rerun and the corrected version posted to the web. The workdays for the two (2) invoices for OCN 2834 are now included in the PMAP-generated values for CLEC Region Resale for the CRIS bills, thereby agreeing with the KCL calculated values. The BBS End User ACNAs of ZZR and ZZS were not involved in this exception."

Summary of KCL Re-Test Activities (by Issue Number):

1. Coordinated Customer Conversions in the Provisioning category for the CLEC Aggregate.

Based upon BellSouth's responses, KCL reviewed the original raw data file that BellSouth sends to the PMAP databases for processing, and recalculated its SQM values using the *cut complete* and *cut start* variables, rather than the *cut minutes* variable. KCL then compared its revised calculations to the original BellSouth report.

2. Timeliness in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

Based upon BellSouth's responses, KCL reviewed the revised instructions that BellSouth provided. KCL recalculated the SQM values, and then compared its recalculations using these instructions to the BellSouth report originally provided.

3. Mean Interval in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

KCL reviewed the revised instructions and narrative that BellSouth provided, and recalculated the SQM values. KCL then compared its recalculations using to the original BellSouth-reported values.

4. Percent Rejected Service Requests in the Ordering category for the CLEC Aggregate.

Based upon BellSouth's responses, KCL received the June 2000 raw data. KCL calculated SQM values using these data and the instructions found in the July Raw

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Data User Manual. KCL then compared the KCL-calculated values to the BellSouth-reported values for June.

5. *Reject Interval* in the Ordering category for the CLEC Aggregate.

Based upon BellSouth's responses, KCL applied the methodology found in the February 2000 version of the *Raw Data User Manual* to the October 1999 raw data, and compared the resulting KCL-recalculated values to the original BellSouth-reported values.

6. *FOC Timeliness* in the Ordering category for the CLEC Aggregate.

Based upon BellSouth's responses, KCL received the July 2000 raw data and calculated SQM values using the July 2000 *Raw Data User Manual*. KCL then compared the KCL-calculated values to the BellSouth-reported values for this month.

7. *Mean Held Order Interval and Distributions Interval* in the Provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the Provisioning trunks category for the CLEC Aggregate.

Based upon BellSouth's responses, KCL received the July 2000 raw data and calculated SQM values using the July 2000 *Raw Data User Manual*. KCL then compared the KCL-calculated values to the BellSouth-reported values for this month for the non-trunks category. Based upon BellSouth's statement that trunk orders are rarely held, and specifically the fact that there were no held orders for trunks for December 1999 through September 2000, KCL determined that no retesting activity was necessary for the trunks category.

8. *Usage Data Delivery Completeness* in the Billing category for the CLEC Aggregate and BellSouth Retail.

KCL received the revised SQM report for October 1999, and compared the KCL-calculated values to the revised BellSouth-reported values. KCL also received the data and SQM report for June 2000, calculated SQM values using these June data, and compared the KCL-calculated values to the BellSouth-reported values for June.

9. *Mean Time to Deliver Usage* in the Billing category for the CLEC Aggregate and BellSouth Retail.

KCL received the revised SQM report for October 1999, and compared the KCL-calculated values to the revised BellSouth-reported values. KCL also received the

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data and SQM report for June 2000, calculated SQM values using these June data, and compared the KCL-calculated values to the BellSouth-reported values for June.

10. Usage Data Delivery Accuracy in the Billing category for the CLEC Aggregate.

KCL received a new NODS_RQ_Company file that listed CLECs that should be included in the October SQM calculations. (Independent telephone companies and BellSouth's own test accounts are examples of the type of data that might be included in the raw data files, but excluded from the SQM reports.)

Using this new CLEC list, KCL revised its calculations, and then compared the KCL-recalculated values to the original BellSouth-reported values. KCL also received the data, SQM report, and NODS_RQ_Company file for June 2000. KCL then calculated SQM values using these June data, and compared the KCL-calculated values to the BellSouth-reported values for June.

11. Invoice Accuracy in the Billing category for the CLEC Aggregate.

KCL received the July 2000 data, and a new NODS_RQ_Company file that listed CLECs that should be included in the July 2000 SQM calculations. (Independent telephone companies and BellSouth's own test accounts are examples of the type of data that might be included in the raw data files, but excluded from the SQM reports.)

As described above, KCL also received revised instructions on how to adjust the *revenue* and *adjustment* values when the *revenue* field was negative for a particular invoice.

Using the July 2000 data, CLEC list and instructions, KCL revised its calculations, and then compared the KCL-recalculated values to the revised BellSouth-reported values.

KCL also received the data, SQM report, and NODS_RQ_Company file for August 2000. KCL then calculated SQM values using these June data, and compared the KCL-calculated values to the original BellSouth-reported values for August.

12. Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate.

KCL received the July 2000 data and a new NODS_RQ_Company file that listed CLECs that should be included in the July 2000 SQM calculations. (Independent

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telephone companies and BellSouth's own test accounts are examples of the type of data that might be included in the raw data files, but excluded from the SQM reports.)

Using the July 2000 data and CLEC list, KCL revised its calculations, and then compared the KCL-recalculated values to the revised BellSouth-reported values.

KCL also received the data, SQM report, and NODS_RQ_Company file for August 2000. KCL then calculated SQM values using these June data, and compared the KCL-calculated values to the original BellSouth-reported values for August.

KCL Re-Test Results (by Issue Number):

1. Coordinated Customer Conversions in the Provisioning category for the CLEC Aggregate.

When KCL implemented the new instructions, all of the resulting KCL-calculated values matched the original BellSouth-reported values.

2. Timeliness in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

When KCL followed BellSouth's revised instructions, all of the KCL-calculated values matched exactly the original BellSouth-reported values.

3. Mean Interval in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

When KCL followed BellSouth's revised instructions and narrative, all of the KCL-calculated values matched exactly the original BellSouth-reported values.

4. Percent Rejected Service Requests in the Ordering category for the CLEC Aggregate.

The KCL-calculated values for June 2000 (using the updated July *Raw Data User Manual*) matched exactly the original BellSouth-reported values for June 2000.

5. Reject Interval in the Ordering category for the CLEC Aggregate.

When KCL applied the methodology found in the February 2000 version of the *Raw Data User Manual* to the October 1999 raw data, all of the resulting KCL-calculated values matched exactly the original October 1999 BellSouth-reported values.

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6. FOC Timeliness in the Ordering category for the CLEC Aggregate.

All of the KCL-calculated values matched exactly the BellSouth-reported values for July 2000.

7. Mean Held Order Interval and Distributions Interval in the Provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the Provisioning trunks category for the CLEC Aggregate.

The KCL-calculated values for July 2000 matched exactly the BellSouth-reported values for the non-trunks category. As stated above, there was no retesting for the trunks category, because trunk orders are rarely held.

8. Usage Data Delivery Completeness in the Billing category for the CLEC Aggregate and BellSouth Retail.

The KCL-calculated values matched exactly the revised BellSouth-reported values for October 1999. Additionally, the KCL-calculated values matched exactly the BellSouth-reported values for June 2000.

9. Mean Time to Deliver Usage in the Billing category for the CLEC Aggregate and BellSouth Retail.

The KCL-calculated values matched exactly the revised BellSouth-reported values for October 1999. Additionally, the KCL-calculated values matched exactly the original BellSouth-reported values for June 2000.

10. Usage Data Delivery Accuracy in the Billing category for the CLEC Aggregate.

The KCL-recalculated values matched exactly the original BellSouth-reported values for October 1999. Additionally, the KCL-calculated values matched exactly the original BellSouth-reported values for June 2000.

11. Invoice Accuracy in the Billing category for the CLEC Aggregate.

The KCL-recalculated values matched exactly the revised BellSouth-reported values for July 2000. Additionally, the KCL-calculated values matched exactly the original BellSouth-reported values for August 2000.

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12. Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate.

The KCL-recalculated values matched exactly the revised BellSouth-reported values for July 2000. Additionally, the KCL-calculated values matched exactly the original BellSouth-reported values for August 2000.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 52.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 52.

Attachments: None.

Date: December 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's electronic ordering systems do not provide the functionality required for submitting UNE-to-UNE migration service requests.

Summary of Exception:

A CLEC issues a UNE-to-UNE migration service request to convert a customer from one Unbundled Network Element (UNE) service delivery platform to another UNE delivery platform. A facilities-based CLEC may change its service delivery method during the course of doing business with BellSouth.

For example, a start-up CLEC with limited or no facilities may at some point acquire switching facilities. This CLEC, initially serving its customers via UNE Loop-Port Combinations, may want to convert these customers to a UNE Loop service offering. Similarly, a provider serving customers via UNE Loop-Port Combinations may obtain alternative access into the customer premises (e.g., cable), triggering a need for conversion to UNE Port service delivery.

BellSouth does not support CLEC service requests for any type of UNE-to-UNE conversion, such as those scenarios outlined above.

In response to a KPMG service request to convert a UNE Loop-Port Combination customer to a UNE Loop customer, BellSouth delivered an error message stating that the "Conversion specified can only be used on retail to UNE service".¹ After submitting this issue to the BellSouth Customer Support team, KPMG was informed that UNE-to-UNE migrations are not supported by BellSouth electronic ordering systems.

Summary of BellSouth Response:

"BellSouth does support electronic ordering from UNE Port/Loop to UNE Loop with Number Portability (Reqtyp B). BellSouth currently does not support electronic ordering from UNE Port/Loop to UNE Loop (Reqtyp A).

BellSouth's long term plans are to continue to enhance the functionality of its systems to support electronic ordering of services. BellSouth is currently assessing the feasibility of

¹ PON 433A127PEH000004, Version 00, Company Code 9994, submitted 2/1/00.

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supporting UNE to UNE conversions (Reqtyp A) and will submit a request via the Change Control Process to be reviewed and prioritized by the Change Control Team.”

Summary of KCL Re-test Activities:

KCL's re-test activities for this exception consisted of:

- 1) Conducting a review of BellSouth's activities relating to Change Request CR0030. KCL reviewed the request in BellSouth's internal Change Request Log dated April 2000, and attended the June 28th Change Control meeting to observe the presentation and prioritization of this request.
- 2) Submitting three electronic transactions to test ordering functionality associated with UNE Loop-Port Combination – to – UNE Loop with LNP migrations. To set up these transactions, KCL solicited the assistance of a friendly CLEC currently ordering Loop-Port Combinations and Loops with LNP from BellSouth in Georgia². BellSouth established Loop-Port Combination test bed accounts under the friendly CLEC's name. KCL then prepared and submitted Local Service Requests (LSRs) to migrate the customers' service to UNE Loop with LNP.

KCL Re-test Results:

All three electronically-submitted LSRs for UNE Loop-Port Combination – to – UNE Loop with LNP migrations were successfully processed by BellSouth electronic ordering systems. All transactions received Firm Order Confirmations (FOCs).

BellSouth does not support other variations of UNE-to-UNE migrations in the TCIF 7 release of its ordering interfaces. BellSouth has submitted requests via the Change Control Process to introduce this ordering functionality into its OSS '99 (TCIF 9) interface release. This functionality addition is proceeding through the Change Control Process (see CR0030 for additional information and implementation schedule).

Pursuant to direction from the Georgia Public Service Commission (GPSC), KCL evaluated those services that are electronically-orderable in BellSouth's TCIF 7 release of its ordering interfaces. KCL produced this exception with the belief that various types of UNE-to-UNE migrations are electronically orderable in TCIF 7. However, after subsequent investigation KCL determined that the only UNE-to-UNE migration activity electronically orderable in TCIF is a conversion from UNE Loop-Port Combination to UNE Loop with LNP. As a result, the ordering of other variations of UNE-to-UNE

² Due to KCL's status as a pseudo-CLEC, KCL is unable to perform LNP ordering activities under its own Company Codes.



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migrations is not within the scope of the evaluation of services that are electronically-orderable in TCIF 7, as specified by the GPSC.

The Georgia Public Service Commission may elect to monitor this issue with respect to subsequent TCIF releases in the future.

In the absence of any other planned test activity, KCL closes this exception for testing purposes.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 54.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 73

BellSouth Georgia OSS Testing Evaluation

Date: December 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's CRIS/CABS billing documentation is deficient in the breadth and depth of topical coverage.

Summary of Exception:

In the course of the CRIS/CABS Invoicing Documentation Test (BLG-5), KPMG Consulting LLC (KCL) evaluated billing documentation provided by BellSouth for use by the CLECs¹. The objective of this test was to determine whether the billing documentation provided by BellSouth adequately supports the CLECs in handling BellSouth-provided CRIS/CABS bills.

KCL reviewed the breadth and depth of topical coverage contained in CRIS/CABS documentation. Topics considered were:

- Understanding Billing.
- Receiving and Processing Bills.
- Validating Bills.
- Processing Credits and Adjustments.
- Getting Help.

During testing, KCL determined that BellSouth's billing documentation was insufficient to support bill validation in the following ways:

1. The documentation does not provide comprehensive information about charges and fees.
2. Information defining the various sections of an invoice is not included in the documentation.
3. The documentation provides an inadequate number of bill samples.
4. Information about charge calculations, such as usage and pro-rated fractional charges, is not included in the documentation.
5. Information regarding obtaining and interpreting a Customer Service Record (CSR) is not included in the documentation.

¹ CRIS (Customer Record Information System) and CABS (Carrier Access Billing System) are BellSouth invoicing systems, which provide information to CLECs for a variety of re-sale and UNE products.

6. Universal Service Order Code (USOC) information is provided; however, this information is incomplete.

BellSouth's Response:

BellSouth answered each point noted in the original KCL Exception Report. Their responses are as follows:

1. "The documentation provided to CLECs for invoices is not intended to provide product or service specific information pertaining to charges or fees for such services. Information as to what charges the CLEC should expect for each service ordered from BellSouth can be found in either the tariffs filed with the Georgia PSC and FCC or the interconnection agreement or other product documentation as BellSouth may elect to publish."
2. "BellSouth reviewed its documentation and included a general description of the bill sections for the each of the types of bills produced. For bills formats using the guidelines developed at the Ordering and Billing Forum (OBF), proprietary agreements preclude BellSouth from providing CLECs with the detail record layouts, field definitions or other information owned by other companies. BellSouth published a CLEC Billing Guide on the Interconnection WEB site. Version 2 of the CLEC Billing Guide, which contained bill layouts, bill sections, and their descriptions, was published 6/16/00."
3. "BellSouth reviewed its documentation and included additional samples of bills provided to CLECs. However, as stated in the reply to issue 1 above, the billing documentation is not intended to provide a CLEC with information on the billing of each type of service which could be ordered from BellSouth. Also, as stated above, the publication date for version 2 of the CLEC Billing Guide, which contained bill layouts and their descriptions, was 6/16/00."
4. "BellSouth reviewed its documentation and included additional information on how charges are calculated for pro-rated fractional charges and a general description of the aggregation and calculation of usage charges. The publication date for Understanding Your Bill was 7/28/00, which addressed the calculation and aggregation of charges."
5. "Obtaining live CSR data is not a function of the billing processes established by BellSouth. Delivery of an as rendered CSR with the bill, was addressed in the CLEC Billing Guide published on 6/16/00."
6. "BellSouth requires additional details describing this issue. A description for each USOC used by BellSouth, which represents a service being ordered, provisioned

and billed, can be found on the bill/CSR provided on the monthly basis. Again, as stated above, the publication date for version 2 of the CLEC Billing Guide, which will contain bill/CSR layouts and their descriptions, was 6/16/00."

"The WEB address for the all Billing Documentation referenced above is:
http://www.interconnection.bellsouth.com/guides/other_guides.html

Overall CLEC Billing Guide Publication Information:

The initial publication of the BellSouth CLEC Billing Guide was 6/1/00. The initial version contains information to address the following topics:

- Billing Introduction
- Billing Overview
- Billing Process Flow
- Daily Processing
- Bill Period Processing
- Bill Formatting, Media, and Delivery Options
- Electronic Bill Products
- ADUF
- ODUF
- EODUF
- Billing Terminology
- Frequently Asked Questions

Version 2 of the BellSouth CLEC Billing Guide was published on 6/16/00. Version 2 added bill/CSR layouts, bill sections and their descriptions."

Summary of KCL Re-test Activities:

KCL reviewed the 6/16/00 version of the "BellSouth CLEC Billing Guide" and the 7/28/00 version of "Understanding Your Bill." The URL where both of these documents are located is

http://www.interconnection.bellsouth.com/guides/other_guides.html.

KCL Re-test Results:

Upon review of the "BellSouth CLEC Billing Guide"; the "Understanding Your Bill" document and other documentation (i.e., BellSouth tariffs and OBF CBOS BDT



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Guidelines), KCL found that BellSouth's responses addressed the five deficiencies noted in the Exception and support the validation of CRIS and CABS CLEC bills.

1. BellSouth's response indicated that information about charges and fees would be found in either the tariffs filed with the Georgia PSC and the FCC, or in the interconnection agreement between the CLEC and BellSouth. By examining the

BellSouth tariffs and tariff notifications located at the URL, <http://cpr.bst.bellsouth.com> KCL was able to validate the information in BellSouth's response.

2. KCL validated that the guidelines developed by the Ordering and Billing Forum (OBF) apply to the CABS CBOS Billing Data Tape (BDT) format described in the "BellSouth CLEC Billing Guide." In addition, upon review of Chapter 3 of the "BellSouth CLEC Billing Guide", KCL validated that it included bill samples with descriptions of the various sections of Customized Large Users Bill (CLUB), CABS Bill and J & N Bill formats.
3. KCL validated that BellSouth had included bill samples for the Customized Large Users Bill (CLUB), CABS Bill and J & N Bill formats in Chapter 3 of the "BellSouth CLEC Billing Guide".
4. KCL validated that BellSouth had included additional information on how charges are calculated in the 7/28/00 version of the document "Understanding Your Bill." For example, "Appendix A – Billing Concepts" details the calculation of pro-rated fractional charges while "Appendix D – UNE Usage Bill Section Mapping" assists in the understanding of which call flows and which switching rate elements are applicable to UNE Usage. In addition, other charge calculations are detailed in bill format specific sections throughout the "Understanding Your Bill" document. For example, the elements aggregated to come up with the Total Current Charges line item on the bill are detailed in section B(1) CABS Bill Overview.
5. KCL validated that BellSouth had included information on how a Customer Service Record (CSR) is obtained (as part of the bill --- "an as rendered CSR") and how to interpret this CSR. For example, the information on how to interpret the content of an as rendered CSR for a J Bill or an N Bill is detailed in Chapter III Section Four "J and N Bill Layout."
6. KCL withdrew this issue in its 5/23/00 revision of Exception 73.

Based on BellSouth's response, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 73.

Attachments:

None.

Date: December 14, 2000

EXCEPTION CLOSURE REPORT

Initial Exception: BellSouth does not have a clearly defined change management process for the *PMAP Raw Data User Manual (RDUM)*.

Amended Exception: Additionally, BellSouth does not consistently update the "Version Changes" section of the *PMAP RDUM*.

Summary of Initial Exception:

Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of Service Quality Measurement values (SQMs) for the CLECs engaged in business activity with BellSouth in the state of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

The instructions for calculating certain SQM values are contained in the *PMAP RDUM*. BellSouth publishes the manual and the corresponding raw data to provide CLECs with the ability to calculate their SQM values independently and thus verify the reports. BellSouth has indicated that updates to the manual are typically made after the close of a PMAP production cycle. Updates are posted on the PMAP Web site.

KPMG Consulting LLC (KCL) observed that BellSouth lacks a clearly defined change process for managing synchronization between the SQM report production process and updates to the *PMAP RDUM*. By definition, the instructions contained in the *PMAP RDUM* should be synchronized with the PMAP validation scripts to ensure that SQM calculation procedures are accurate and complete.

BellSouth personnel informed KCL that the change management process for the *PMAP RDUM* is separate from the change management process for PMAP itself. Changes to the *PMAP RDUM* are driven by changes to the raw data validation scripts, which are used during the PMAP production cycle to ensure that the SQM reports can be replicated using the raw data. BellSouth personnel informed KCL that BellSouth ensures that the *PMAP RDUM* is synchronized with the validation scripts². However, BellSouth did not provide documentation of the procedures followed to ensure that this synchronization is accomplished.

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

² If an SQM definition is changed in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*, a corresponding change must be made to the PMAP validation scripts. Failure to change the validation scripts will cause an error in the validation process.

Summary of Amended Exception:

The "Version Changes" section summarizes the changes that occur between subsequent versions of the *PMAP RDUM*. BellSouth has not consistently updated this section for each new version of the *PMAP RDUM*.

The following examples illustrate the inconsistency of BellSouth's updates to the "Version Changes" section of *PMAP RDUMs*:

1. BellSouth published multiple versions of the *PMAP RDUM, Version 2.04* without changing the version number.
2. In the *PMAP RDUM, Version 2.07, dated July 26, 2000*, BellSouth listed changes implemented in the first iteration of Version 2.04. However, BellSouth did not include changes that occurred in versions subsequent to the first iteration of Version 2.04. That is, changes made subsequent to the first iteration of Version 2.04 up to and including Version 2.07 do not appear in the "Version Changes" section.
3. In the "Version Changes" section of the *PMAP RDUM, dated August 31, 2000, Version 2.08*, BellSouth included all changes implemented in Versions 2.07 and 2.08. However, the "Version Changes" section does not list any other changes implemented in manuals published after the first iteration of Version 2.04.

Summary of BellSouth's Response:

The Performance Measurement Group's Issue Management and Change Control Process Guide is being updated to correct this oversight. The update will broaden the scope of the guide to document the way issues and changes are tracked from instigation through completion. It will apply to all issues and changes that require formal tracking within the group. This will include changes to the Raw Data User Guide. It is available to all members of the Performance Measurement Group on their PMAP Shared Drive.

Version 2.2 of the Issues Management and Change Control Process was released on 7/7/00. An electronic copy was provided to KPMG representatives as part of the response to this Exception.

This document fixed responsibility for updating the Raw Data Users Manual and maintaining contact with the data owners. In the future, the Raw Data Users Manual will be updated each time the SQM is updated. SMEs and the programmers have been notified of these changes. The change requests must be properly annotated before they are closed. Examples of correctly annotated Change Requests were sent to KPMG as part of the response to the initial exception.

**CLOSURE REPORT FOR EXCEPTION 88****BellSouth Georgia OSS Testing Evaluation**

BellSouth publishes an updated PMAP Raw Data User Manual (RDUM) in conjunction with each new release of system software, e.g. an updated manual was posted to the PMAP website in conjunction with the 10/1/00 release of PMAP 2.0.10. Each manual is identified with a version number that matches the PMAP release that it supports. In addition, updated manuals are published to the Internet by the 15th of the month when corrections are needed that impact the CLEC's ability to replicate SQMs. In these cases, the updated RDUMs are labeled with the PMAP version number and the issue date. Each manual contains a log showing the changes reflected in that version of the manual, as well as a cumulative log of the changes included in previous versions of the manual.

Amended Exception 88 identified omissions to the Release 2.0.4 RDUM version change log. These omissions were corrected in the Version 2.0.8 manual posted to the PMAP website 9/25/00. These version change log omissions were:

Version 2.0.4 - Additional Changes/Corrections previously omitted from Log

(Note: S2 = Step 2, S7 = Step 7, etc.)

RDUM Section III – Instructions changed in the following reports:

- Ordering:
 - % Rejected Service Requests (S2)
 - FOC Timeliness – Non-Trunks (S2, S3)
 - FOC Timeliness Trunks (S3)
 - Reject Interval (S2, S3)
- Provisioning:
 - % Missed Installation Appointments (S2, S5, S7 grammar, S8, S9)
 - % Missed Installation Appointments – Trunks (S2, S6, S8, S9 typo, S10 typo)
 - Troubles Within 30 Days of Provisioning - Non Trunks (S2, S4, S7)
 - Troubles Within 30 Days of Provisioning - Trunks (S2, S4, S7, S10 typo)
 - Held Order Interval (S6, S7, S8 and S9)
 - Held Order Interval – Trunks (S6, S7, S8)
 - Order Completion Interval (S2, S6 typo)
 - Order Completion Interval – Trunks (S2, S6 typo on field name)
 - Average Completion Notice Interval (S2 format, S3, S5)
 - Jeopardy Interval & Percent Jeopardy (S7)
 - Total Service Order Cycle Time (S2, S4 typo, S5, Reference table after Steps)
- Maintenance and Repair:
 - Customer Trouble report Rate (S6)
 - Missed Repair Appointments (S5-S7)

RDUM Section IV

- Ordering – FOC Timeliness (cmpltn_dt – description changed)
- Ordering – FOC Timeliness – Trunks (cmpltn_dt – description changed)

- Ordering – Reject Interval and Percent Rejected by Interval (cmpltn_dt – description changed)
- Ordering – Service Orders (cmpltn_dt – description changed)
- Provisioning – Held Orders (cmpltn_dt – description changed)
- Provisioning – Order Completion Interval Distribution
 - so_missed_cmtt_cd - description changed
 - so_missed_cmtt_desc - description changed
 - cmpltn_dt – description changed
- Provisioning - Order Completion Interval Distribution – Trunks
 - so_missed_cmtt_cd - description changed
 - so_missed_cmtt_desc - description changed
 - cmpltn_dt – description changed
- Provisioning – Percent Missed Installation Appointments (cmpltn_dt – description changed)
- Provisioning – Percent Missed Installation Appointments – Trunks (cmpltn_dt – description changed)
- Provisioning – Troubles Within 30 Days of Provisioning – Trunks (cmpltn_dt – description changed)
- Provisioning – Troubles Within 30 Days of Provisioning (cmpltn_dt – description changed)
- Provisioning – Jeopardy Interval (cmpltn_dt – description changed)
- Provisioning – ACNI (cmpltn_dt – description changed)
- Provisioning – TSOCT (cmpltn_dt – description changed)

Summary of KCL Re-Test Activities:

Regarding the issues raised in the initial exception, KCL reviewed Version 2.2 of the *Issues Management and Change Control Plan* document forwarded by BellSouth, and the dissemination of the document to BellSouth personnel.

KCL reviewed BellSouth's statements about how the RDUM will be synchronized with the validation scripts and the SQM manual. KCL also reviewed BellSouth's actual practice of updating the RDUM since the new change control process manual was issued, by reviewing numerous change requests.

Additionally, KCL reviewed BellSouth's new policies about numbering versions of the RDUM. KCL also reviewed the processes in place for maintaining the version change log up-to-date.

KCL Re-Test Results:

KCL noted that BellSouth has made revisions to its process of updating the RDUM, as described in the updated *Issues Management and Change Control Plan*. Specifically, BellSouth has committed to ensuring that its validation scripts, RDUM, and SQM manual are synchronized, by allocating responsibility within BellSouth for updating the RDUM. As noted in BellSouth's response above, SMEs and system programmers have been notified of these changes in responsibilities and procedures. Most importantly, change requests will be annotated to indicate that all updates to the RDUM have occurred, before the Request is closed.

KCL reviewed over a dozen change requests that were issued after the new process went into effect. For all change requests that required an update to the RDUM, it was verified that such changes were implemented correctly.

Finally, KCL believes that BellSouth's new numbering scheme for manuals will enable different versions to be tracked more easily. Additionally, BellSouth has been tracking version changes more extensively, and processes appear adequate to ensure listing all relevant changes to the RDUM in the version change log that appears in the manual.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 88.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 88.

Attachments: None.

Date: December 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

KPMG Consulting LLC (KCL) cannot replicate three of BellSouth's reported Service Quality Measurements (SQMs) in the March 2000 performance measurement reports.

Summary of Exception:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KCL is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KCL has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance³ from BellSouth.

KCL has been unable to replicate the following SQM values for the KCL CLEC for the month of March:

1. **Ordering - Firm Order Confirmation Timeliness.** KCL was unable to replicate the BellSouth reported values for the Residence product level for the Fully Mechanized and the Total Mechanized reports.

Category	KCL Calculations	BellSouth's Report
Total Mechanized; OCN 9992; Residence; LSR Count 0-15	0	1
Total Mechanized; OCN 9992; Residence; 0-15 Min	0.00%	5.26%

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) web site.

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site.

³ "Technical Assistance" refers to any calculation instruction KCL may have received in the replication of CLEC aggregate or non-PMAP (manually calculated) metrics.

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Total Mechanized; OCN 9992; Residence: LSR Count 15-30	15	14
Total Mechanized; OCN 9992; Residence: 15-30 Min	78.95%	73.68%
Fully Mechanized; OCN 9992; Residence: LSR Count 0-15	0	1
Fully Mechanized; OCN 9992; Residence: 0-15 Min	0.00%	5.26%
Fully Mechanized; OCN 9992; Residence: LSR Count 15-30	15	14
Fully Mechanized; OCN 9992; Residence: 15-30 Min	78.95%	73.68%

2. **Provisioning - Order Completion Interval.** For the UNE Dispatch report, KCL was unable to replicate the UNE Non-Design product level, using BellSouth's instructions.

Category	KCL Calculations	BellSouth's Report
UNE Non-Design; OCN 9994; < 10 Circuits; Dispatch; Total Orders 5-10 Days	1	2
UNE Non-Design; OCN 9994; < 10 Circuits; Dispatch; 5-10 Days	33.33%	40.00%
UNE Non-Design; OCN 9994; < 10 Circuits; Dispatch; Average Interval (Days)	12.0	11.4
UNE Non-Design; OCN 9994; ≥ 10 Circuits; Dispatch; Total Orders 5-10 Days	0	1
UNE Non-Design; OCN 9994; ≥ 10 Circuits; Dispatch; 5-10 Days	0.00%	33.33%
UNE Non-Design; OCN 9994; ≥ 10 Circuits; Dispatch; 15-20 Days	100.00%	66.67%
UNE Non-Design; OCN 9994; ≥ 10 Circuits; Dispatch; Average Interval (Days)	19.00	15.67

3. **Provisioning - Coordinated Customer Conversions.** KCL was unable to replicate the following BellSouth reported values.

Category	KCL Calculations	BellSouth's Report
Without Number Portability; Count ≤ 5	29	40
Without Number Portability; % ≤ 5	85.29%	88.89%
Without Number Portability; 5 > % ≤ 15	14.71%	11.11%
Without Number Portability; Total Count	34	45
Without Number Portability; Total Minutes	158	161
Without Number Portability; Average Interval (Minutes)	4.65	3.58

Summary of BellSouth's Response:**1. Ordering - Firm Order Confirmation Timeliness**

"BellSouth identified a problem in the interval 'buckets'. The difference between KCL's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (confirmed) in the 15th minute. KCL was putting those LSRs in the 15-30 minute "bucket" while PMAP was including them in the 0-15 minute 'bucket'.

As a result of this KCL draft exception, System Change Request 5848 was opened to clarify the bucket definitions and was effective for May data that was published in June. An interval chart for CR 5848 is shown below. The Raw Data Users Manual was updated in May, reflecting these changes.

The *FOC Timeliness* for the May report had to be rerun because prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on weekends continued to be excluded. The code was corrected and the report was rerun on July 27. Notification that May Ordering Reports had been rerun was posted to the Web on August 1, 2000. The July SQM further clarified the bucketization issue. BellSouth has provided KCL with *FOC Timeliness* data for May and June 2000 for retesting.

Change Request 5848 corrected the "Mechanized" FOC interval buckets as shown:"

0 - <15 min	4 - <8 hrs
15 - <30 min	8 - <12 hrs
30 - <45 min	12 - <16 hrs
30 - <45 min	16 - <20 hrs
45 - <60 min	20 - <24 hrs
45 - <60 min	24 - <48 hrs
60 - <90 min	>= 48 hrs
90 - <120 min	
120 - <240 min	

2. Provisioning - Order Completion Interval

"BellSouth agrees that using Version 2.0 of the Raw Data Users Manual, KCL was unable to replicate for the test CLEC the following data: for March 2000, the UNE Non-Design product for OCN 9994.

**CLOSURE REPORT FOR EXCEPTION 90****BellSouth Georgia OSS Testing Evaluation**

The instructions to create a report using the exclusion "so_cmtt_cd = 'L'" will not yield results identical to the SQM reports. The SQM report performs additional exclusions, permitting supplementary "L" orders into the final report. Specifically, "L" orders with commitment dates from prior months are not being excluded. BellSouth issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" and was effective for March data. This change will enable the monthly reports to match results created using the Raw Data Users Manual.

BellSouth provided KCL with the April OCI data and reports. The discrepancies identified by KCL in the April Average Completion Interval and Order Completion Interval reports were explained by differences in the functionality of KCL and BellSouth's tools used to replicate the reports from Raw Data.

Step 2 Bullet 2 of the Raw Data User's Guide (RDUG) currently instructs the user to "Exclude records where SO_CMTT_CD = 'L'." This statement was changed to read "Exclude records where SO_CMTT_CD = 'L' or SO_CMTT_CD is null" in the September 2000 release of the RDUG.

The reason that BellSouth and KCL were calculating different values from the raw data is because the aforementioned exclusions are handled identically using SQL to query the Oracle database. If one excludes records with a certain value in a field, then records with null values in that field are also excluded.

However, using KCL's tool, the above statements are not identical. If records are excluded with a certain value in a field, then all other values are considered valid, including null values. Records with null values are not valid for the Order Completion Interval metric is because these are "listing" records, where no work has been performed. Change request 5923 was implemented to filter these records in the PMAP system beginning with June Data.

In the Raw Data User's Guide (RDUG), the Order Completion Interval and Order Completion Interval Trunks instructions were changed to ensure that a null value in the SO_CMTT_CD field would cause that record to be excluded from the selection process.

Change request 5923 prescribed a code change which prevents these listing orders from entering the PMAP Normalized Operational Data Store (NODS). Since there was no work performed on them, these are not valid provisioning orders. Beginning with June Data, posted in July, these orders are absent from NODS and raw data.

If a CLEC attempts to replicate raw data before June, the additional exclusion of records where "SO_CMTT_CD is null" will allow this. For data later than May, this exclusion will no longer exclude any orders since they will have already been removed due to the code fix resulting from Change Request 5923."

**CLOSURE REPORT FOR EXCEPTION 90****BellSouth Georgia OSS Testing Evaluation**

3. Provisioning - Coordinated Customer Conversions.

“The file sent to KCL for replication was the original raw data file from WFA-C and did not contain some additional data (Cut Start Minutes) that had to be obtained from CCSS. This accounts for one record included in the BellSouth report which was not included in the KCL replication. Also, there was a miscalculation in the summation of the number of items by the KCL replication process (items for 5 orders were not counted).

A copy of the file that BellSouth used to generate the report has been provided to KCL. KCL was informed of the miscalculation problem and the orders that were not included in the calculation.

KCL will attempt to generate the report again using the new file provided and ensure that all items are included in the calculation. KCL reported on 6/12/00 that they were able to replicate the Provisioning - *Coordinated Customer Conversions* metric for the BellSouth reported values.”

Summary of KCL Re-Test Activities (by Issue Number):**1. Ordering - Firm Order Confirmation Timeliness**

As indicated above, BellSouth requested that KCL perform its review beginning with the May 2000 raw data and SQM reports. KCL received the data and calculated SQM values. KCL then compared these values to the BellSouth-reported values. KCL has also reviewed the KCL Test CLEC reports for each month since May 2000 as a part of its regular testing activities.

2. Provisioning - Order Completion Interval

KCL examined BellSouth’s revised March SQM report, which reflected the additional exclusion of records where *so_cmtt_cd* is equal to “L.” KCL also reviewed all of the reports beginning with April 2000, and compared the BellSouth-reported values with the KCL-calculated values. (KCL reviews the KCL Test CLEC reports for every month as a part of its regular testing activities.) In addition, KCL also revised its computer programs to incorporate the revisions BellSouth made to the calculation instructions – that is, to exclude records where the *so_cmtt_cd* field is “null.”

3. Provisioning - Coordinated Customer Conversions

KCL received additional data from BellSouth and recalculated SQM values. KCL then compared the revised calculated values to the BellSouth-reported values.

KCL has also reviewed the KCL Test CLEC reports for the months of April, May and September 2000 as part of its regular testing activities. Note that KCL did not generate transactions for this SQM for June through August 2000.

KCL Re-Test Results (by Issue Number):**1. Ordering - Firm Order Confirmation Timeliness**

The KCL-calculated values did not match the initial BellSouth-reported values for May 2000. BellSouth then updated its code and revised its May 2000 report, such that FOCs received during the weekend were not automatically excluded from the calculations. Clarifications were also made to the *Raw Data User Manual*. KCL then compared its calculations to the revised BellSouth-reported values, and determined that the values matched exactly.

The KCL-calculated values did not match the initial BellSouth-reported values for June 2000 for the same reasons that KCL could not match the BellSouth-reported values for May 2000. When BellSouth updated its code and revised its June 2000 report, KCL was able to match the revised BellSouth-reported values exactly. (See Exception 110 for additional information.)

KCL has been able to match its calculated values to the BellSouth-reported values for all months since July 2000.

2. Provisioning - Order Completion Interval

After BellSouth updated its code to exclude the records where the *so_cmtt_cd* field had a value of "L," and re-ran the March report, KCL compared its calculations to the revised BellSouth SQM report. The KCL-calculated values matched exactly the revised BellSouth-reported values.

As noted in BellSouth's response above, the *Raw Data User Manual* did not indicate that all records with the *so_cmtt_cd* field having a null value should be removed from the calculation. Based upon this missing instruction, KCL was initially unable to replicate the April SQM report. However, the manual has now been updated, and these records are also eliminated prior to the creation of the raw data. KCL re-calculated its values for April 2000. The recalculated values matched the originally reported BellSouth values, exactly.

Additionally, KCL has matched the BellSouth-reported values for all SQM reports since May 2000.

3. Provisioning - Coordinated Customer Conversions

The KCL-recalculated values matched exactly the original BellSouth-reported values for the month of March 2000.

The KCL-calculated values also matched the BellSouth-reported values for April and September 2000. While the KCL-calculated values did not initially match the BellSouth-reported values for May 2000, the causes of these calculation discrepancies were unrelated data and formatting issues. (See Exception 100 for additional information.) Note that KCL did not generate transactions for this SQM for June through August 2000.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 90.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 90.

Attachments: None.



Date: December 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

The BellSouth ECTA Gateway does not allow CLECs to process trouble reports for PBX circuits in the state of Georgia.

Summary of Exception:

KPMG Consulting (KCL) attempted to submit trouble reports for Georgia PBX circuits via ECTA. KCL received error responses from the ECTA Gateway for each attempted submission of a PBX trouble report. KCL confirmed that no trouble ticket was created in either the LMOS or WFA databases.

Summary of BellSouth's Response:

"BellSouth's ECTA Gateway was not designed to allow CLECs to process trouble reports for PBX circuits. The BellSouth Electronic Communications Trouble Administration (ECTA) gateway interface is built according to the ANSI standards T1.227, T1.228 and T1.262 as defined in the Joint Implementation Agreement (JIA) between BellSouth and each ECTA client.

The Managed Object Instance, MOI, formats (i.e., the various telephone number and circuit ID formats supported) are negotiated between the Manager (CLEC) and Agent (BellSouth) and defined in the JIA.

Initially, six MOI formats accommodated all of the BellSouth service offerings obtained by CLECs. At the request of the ECTA CLEC users, a seventh MOI was added to support SLI UNE loops.

Not every BellSouth service offering is currently supported by the existing set of MOI formats, rather only those requested by the client community. PBX lines are such an example. If an ECTA using CLEC were to offer PBX lines provisioned from BellSouth and would like to use ECTA to process PBX trouble reports, they would negotiate a new MOI via the change control process. To date, no CLEC has requested the ability to report troubles on PBX lines."

CLOSURE REPORT FOR EXCEPTION 96

BellSouth Georgia OSS Testing Evaluation

Summary of KCL Re-test Activities:

As BellSouth indicated that they will not be making modifications to the ECTA Gateway based on Exception 96, KCL was unable to perform any re-testing activities.

KCL Re-test Results:

Given the relatively low rate of incidence of PBX troubles that could be reported using the ECTA Gateway, and the fact that alternative methods exist to report these troubles (BellSouth's TAFI interface or a call to a BellSouth Service Center), KCL concurs with the opinion of BellSouth that changes to the ECTA Gateway are not necessary at this time.

In the absence of any other planned testing activity, KCL closes this exception for testing purposes.

Based on BellSouth's response, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 96.

Attachments: None.

**CLOSURE REPORT FOR EXCEPTION 101**BellSouth Georgia OSS Testing Evaluation

Date: December 14, 2000

EXCEPTION CLOSURE REPORT**Exception:**

BellSouth-reported raw data values in usage data delivered to the KPMG Consulting LLC (KCL) Test CLEC, used in the calculation of three SQMs do not match the KCL-collected values for April 2000.

Summary of Exception:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KCL is comparing the data that BellSouth uses to produce SQM reports for the KCL Test CLEC with the corresponding data that KCL collects using its own test management tools.

For three usage metrics: 1) *Usage Data Delivery Completeness*, 2) *Usage Data Delivery Timeliness*, and 3) *Mean Time to Deliver usage*, KCL compared BellSouth raw data used to calculate the SQM values for each month from November 1999 to April 2000 with the data KCL maintains as part of functional testing.

KCL could not match the BellSouth-reported raw data values regarding the number of recorded usage records delivered (REC_VOL) to the KCL Test CLEC with the data collected by KCL for April 2000.

The following table lists the discrepancies found between the BellSouth-reported data and KCL -collected data.

DAYS_DELAYED²	BLS-REPORTED VALUES OF REC VOL	KCL-CALCULATED VALUES OF REC VOL
1	159	158
2	1229	1802
3	449	610
4	466	699

¹ These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

² DAYS_DELAYED is the number of days to deliver the usage records.

**CLOSURE REPORT FOR EXCEPTION 101**

BellSouth Georgia OSS Testing Evaluation

DAYS_DELAYED²	BLS-REPORTED VALUES OF REC VOL	KCL-CALCULATED VALUES OF REC VOL
5	393	407
6	272	456
7	181	236
8	7	7
16	0	2
17	11	28
18	0	1
19	0	7
20	0	10
21	8	27
23	0	6
25	0	4
27	0	2
30+	11	5
Total Count	3,186	4,467

Summary of BellSouth Response:

“The original April file problems were related to a corrupt macro that was being used to strip the usage data from the ADUF files. This problem has been corrected for future use and additional quality control measures have been implemented. Those measures include additional verification steps to be performed after each macro is used. The stripped data will be verified back to the original file.

BellSouth sent a revised April file that contains the corrected data files for the Usage reports. The April Usage data files had missing usage data information. That was corrected with this file. KCL requested that the April usage reports would need to be rerun in PMAP to correct. BellSouth will rerun the report and provide a copy to KCL.”

Summary of KCL Re-Test Activities:

BellSouth provided an updated data file for the three usage SQM reports to KCL. KCL compared the KCL-collected usage information to the revised BellSouth-provided file.

BellSouth also provided to KCL revised April SQM reports for the three usage metrics. KCL recalculated the SQM values for April using the new data, and compared its recalculations to the revised SQM reports.

Additionally, KCL compared the KCL-collected data to the BellSouth-provided data, and compared KCL-calculated SQM values to BellSouth-reported values for reports since April 2000.

KCL Re-Test Results:

The usage data in the updated BellSouth-provided data for April matched exactly the corresponding data collected by KCL. By repairing and re-running the macro for KCL, BellSouth addressed an issue that potentially could have affected the other CLECs' data also. The BellSouth-provided raw data file for June 2000 likewise matched the KCL-collected data.

Based upon the revised data, KCL's SQM value calculations matched exactly the revised BellSouth SQM reports for April 2000. Further, the KCL calculations of the three usage SQMs matched the BellSouth-reported values for June 2000.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 101.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 101.

Attachments: None.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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DEC 14 2000

EXECUTIVE SECRETARY
G.P.S.C.

December 14, 2000

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

RE: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Docket No. 8354-U

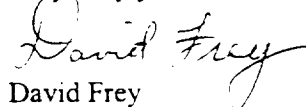
Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 68 (2nd Amended); Exception 76 (3rd Amended); Exception 95 (Amended); Exception 115 (Amended); Exception 116; Exception 117; and Exception 118. Please also find enclosed the following responses from BellSouth: Exception 38 BLS 4th Amended Response; Exception 68 BLS 2nd Amended Response; Exception 77 BLS Amended Response; Exception 113 BLS 2nd Amended Response; Exception 116 BLS Response; Exception 117 BLS Response; and Exception 118 BLS Response.

We request that these documents be filed in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,


David Frey
Manager

Enclosures

cc: Parties of Record



Date: November 21, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

Exception:

BellSouth does not provide complete Firm Order Confirmation (FOC) and Completion Notice (CN) responses.

In response to a valid Local Service Request (LSR), BellSouth generates a FOC, notifying the CLEC of order confirmation and a committed due date. BellSouth transmits a CN to notify the CLEC upon completion of provisioning activities.

BellSouth's *Local Exchange Ordering Implementation Guide*¹ (*LEO Guide*) provides information on the data content and format that will be returned within the FOC and CN responses via EDI. The *LEO Guide* also contains a list of data elements, or fields, that should be present on the response. The *LEO Guide* also contains information on fields that must be populated with data values - based on the specific LSR's Requisition (REQ) and Activity (ACT) type - and on the format characteristics (e.g., nine alpha characters) of those data values.

BellSouth's *TAG API Reference Guide*² (*API Guide*) provides information on the data elements that will be returned within the FOC and CN responses via TAG. The *API Guide* does not contain information on data value usage and format requirements. BellSouth provides this data value information in the *LEO Guide*, which provides ordering business rules for both the TAG and EDI interfaces.

Based on a detailed comparison of a sample of FOCs and CNs received from both the TAG and EDI interfaces to the data value information specified in the *LEO Guide*, KPMG Consulting LLC (KCL) noted deficiencies in response completeness. These deficiencies fall into five categories:

1. Missing Data Elements

The FOC or CN does not contain fields listed in the BellSouth documentation.

2. Extraneous Data Elements

The FOC or CN contains fields not listed in the BellSouth documentation.

¹ For purposes of this evaluation, KPMG utilized *LEO Guide, Version 7N*.

² For purposes of this evaluation, KPMG utilized *API Guide, Version 2.2.0.7*.

3. *Missing Data Values*

The FOC or CN does not contain data values in one or more fields. According to the BellSouth documentation, these fields are required to be populated based on the order's REQ/ACT type.

4. *Extraneous Data Values*

The FOC or CN contain data values in one or more fields that are prohibited or not applicable according to the BellSouth documentation.

5. *Incorrect Data Values*

The data values populated on a FOC or CN are inaccurate with respect to field format or content, based on rules identified in the BellSouth documentation.

The following tables present the response completeness deficiencies identified by KCL. Results are broken down by response type (FOC or CN) and by ordering interface (TAG or EDI).³ For each category defined above, the table presents a list of those data elements and data values identified with problems, and a percentage of responses affected. For missing, extraneous, or incorrect data values, KCL also provides a reference to the relevant REQ/ACT type data requirements.

³ For the purpose of this response completeness evaluation, KPMG reviewed a sample of 30 responses for each category (FOCs via EDI, FOCs via TAG, CNs via EDI, CNs via TAG).

EXCEPTION 68 (Second Amended)

BellSouth Georgia OSS Testing Evaluation

FOC Responses

	Data Elements	% of Responses Affected	Data Values	% of Responses Affected	Interface
Missing	N/A	N/A	<ul style="list-style-type: none"> Billing Indicator 1 (BI1) Billing Account Number 1 (BAN1) Version (VER) Frame Due Time (FDT) 	<ul style="list-style-type: none"> 17%⁴ 100%⁵ 39%⁶ 100%⁷ 	EDI
Extraneous	<ul style="list-style-type: none"> REMARKS-TYPE 	<ul style="list-style-type: none"> 100% 	<ul style="list-style-type: none"> Channel Pair (CHAN-PAIR) 	<ul style="list-style-type: none"> 23% 	EDI
Incorrect	N/A	N/A	<ul style="list-style-type: none"> Representative Telephone Number (REP-TEL) 	<ul style="list-style-type: none"> 100%⁸ 	EDI
Missing	N/A	N/A	<ul style="list-style-type: none"> Frame Due Time (FDT) 	<ul style="list-style-type: none"> 100% 	TAG
Extraneous	<ul style="list-style-type: none"> ACSTATIONRANGE STATUS CODE STATUSMSG 	<ul style="list-style-type: none"> 100% 100% 100% 	<ul style="list-style-type: none"> Exchange Company Circuit ID (ECCKT) Local Service Request Number (LSR NO) 	<ul style="list-style-type: none"> 13%⁹ 10% 	TAG
Incorrect	N/A	N/A	<ul style="list-style-type: none"> Representative Telephone Number (REP-TEL) 	<ul style="list-style-type: none"> 100% 	TAG

⁴ REQ/ACT Type of BV

⁵ Required for all valid REQ/ACT Types

⁶ Required for all valid REQ/ACT Types

⁷ Required for all valid REQ/ACT Types

⁸ According to BellSouth documentation, the REP-TEL phone number should be 10 numeric characters. However, this field was found to contain hyphens and an incomplete phone number.

⁹ Required for REQ/ACT types AC,AD,AM,AT,AR,AV, and BV

EXCEPTION 68 (Second Amended)

BellSouth Georgia OSS Testing Evaluation

CN Responses

	Data Elements	% of Responses Affected	Data Values	% of Responses Affected	Interface
Missing	<ul style="list-style-type: none"> Frame Due Time (FDT) Telephone Number (Ported) (TNPORTED) 	<ul style="list-style-type: none"> 100% 33% 	<ul style="list-style-type: none"> Billing Account Number 1 (BAN1) Frame Due Time (FDT) 	<ul style="list-style-type: none"> 100% 100% 	EDI
Extraneous	<ul style="list-style-type: none"> REMARKS-TYPE 	<ul style="list-style-type: none"> 100% 	<ul style="list-style-type: none"> Exchange Company Circuit ID (ECCKT) Local Service Request Number (LSR NO) Channel Pair (CHAN-PAIR) 	<ul style="list-style-type: none"> 13% 50% 27% 	EDI
Incorrect	N/A	N/A	<ul style="list-style-type: none"> Representative Telephone Number (REP-TEL) 	<ul style="list-style-type: none"> 100% 	EDI
Missing	N/A	N/A	<ul style="list-style-type: none"> Frame Due Time(FDT) 	<ul style="list-style-type: none"> 80% 	TAG
Extraneous	<ul style="list-style-type: none"> ACTSTATION RANGE TRANSETPUR POSECD STATUS CD - STATUS MSG 	<ul style="list-style-type: none"> 100% 100% 100% 	N/A	N/A	TAG
Incorrect	N/A		<ul style="list-style-type: none"> Representative Telephone Number (REP-TEL) 	<ul style="list-style-type: none"> 77% 	TAG

Impact

Incomplete FOCs and CNs delivered in response to valid LSRs will impact CLECs in the following ways:

- Increase in operating costs.** Extraneous information may cause confusion for CLEC ordering representatives. More seriously, missing or incorrect data elements and data values may not provide the necessary account information to the CLEC. If a CLEC does not receive necessary account information, contacting BellSouth to obtain the information will require additional CLEC resources. Utilizing additional resources will result in an increase in CLEC operating costs.

EXCEPTION 68 (Second Amended)
BellSouth Georgia OSS Testing Evaluation

- **Decrease in customer satisfaction.** If a CLEC does not receive necessary account information, such as frame due time, provisioning activities may be affected. Any provisioning delays that result from this lack of information will decrease CLEC customer satisfaction.

Amended Exception:

To address some of the issues presented in this exception, as well as an issue presented in Exception 75 (BellSouth documentation did not contain Business Rules for Error, Clarification, Jeopardy, and Status response types), BellSouth issued an updated version of its *LEO Guide, Volume 1* on August 28, 2000.

In the modified documentation, BellSouth includes Business Rules for all response types (errors, confirmations, completions, status messages, and jeopardizes) in a single section. BellSouth includes a table that identifies the data elements (fields) that are applicable to each response type. While the current Business Rules for BellSouth responses accurately reflect the data elements returned on each response type, the documentation does not provide an adequate definition of *usage requirements*, by order type, for population of all elements. For a number of fields, the documentation describes the location within BellSouth service order detail from where the response data will come. The documentation fails to consistently note under what circumstances (i.e., order types) BellSouth service orders will contain such information, and therefore when corresponding data elements will be populated on order responses delivered to CLECs.

The following table provides a sample of the data elements containing incomplete usage requirements.

Data Element	Description	KCL Comments
ORD (Order Number)	This information is obtained from the service order field in the fielded IDENT section and provided in the ORD field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
RORD (Related Order Number)	This information is obtained from the service order FID CRO in the unfielded IDENT section and provided in the RORD field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
FDT (Frame Cutover Time)	This information is obtained from the service order, behind the LH	It is unclear whether this field will be returned on all

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Data Element	Description	KCL Comment
	FID FDT in the unfielded IDENT section. This information will be converted to military time and provided in the FDT field on the 855/865.	855/865 responses, or only under certain circumstances.
EBD (Effective Bill Date)	This information is obtained from behind the IEBD LH FID in the bill section on the service order and returned to the EBD field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
LOCBAN (Local Billing Account Number)	This information is obtained from the TN in the fielded IDENT section on the service order and is populated on the IDENT field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
BAN1 (Billing Account Number 1)	The BTN information is provided from behind the BTN field in the Bill Section on the service order. On REQ TYPE B, this will be the BTN from the Interim Number Portability Order and not the Loop Order. This information will be populated on the BAN1 field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only for REQ TYPE B.
BAN2 (Billing Account Number 2)	On a non-designed loop, this information is obtained from the BTN field in the Bill Section of the service order. This field will be used only for REQ TYPE B. It will always come from the Loop order. This information is populated in the BAN 2 field on the 855/865. On a designed loop, this information is obtained from behind the TN field in the fielded IDENT section of the service order and populated in the BAN 2 field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only for REQ TYPE B.

Second Amended Exception (November 21, 2000)

KCL is amending this exception to include incomplete responses for additional response types. BellSouth has returned incomplete Jeopardy Notifications and Missed

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Appointment Notifications (Status Messages) relative to the requirements outlined in the *Local Exchange Ordering Guide, Volume 1, Issue 7S*. The following table identifies those fields that KCL failed to receive on responses. According to BellSouth documentation, these fields were required. For each PON listed, all fields identified were missing.

Response Type	PON*VER	CC	Missing Fields
Jeopardy	301A112PTH100009*03	9994	REFNUM
	309A122PTH100009*00	9994	ECCKT
	317A122PTH101001*00	9991	ERROR-CODE
	424A314PTJ000001*02	9994	ERROR-MSG
	607A214PTJ101003*00	9991	CKR
	302A312PEH000003*01	9994	CFA
	305A112PEH100003*00	9994	L-ORD
	305A222PEH101001*06	9994	PORTED
	432A214PEJ100006*02	9991	CABLEID
	607A214PEJ103001*05	9991	SHELF
			SLOT
			CHAN-PAIR
			OTN
Missed Appointment	301A222PTH103001*11	9994	REFNUM
	350A112PTI100001*04	8758	ECCKT
	351A212PTI000001*02	8758	ERROR-CODE
	801A222PTI100006*00	7125	ERROR-MSG
	305R112PEH000006*00	9991	CKR
	315R212PEH000003*02	9991	CFA
	435R114PEJ000001*04	9990	L-ORD
			PORTED
			CABLEID
			SHELF
			SLOT
			CHAN-PAIR
			OTN

Date: December 5, 2000

EXCEPTION REPORT

An exception has been identified because of the Provisioning Verification Evaluation Retest.

Exception:

KPMG Consulting LLC (KCL) encountered numerous BellSouth provisioning errors for Unbundled Network Element (UNE) orders.

During provisioning verification testing, data from confirmed Local Service Requests (LSRs) was compared to: a) post-order Customer Service Records (CSRs); b) switch translation data; and c) the BellSouth directory listing database.

Of the 89 switch translations for lines that were validated, 22 lines (24.7%) contained information inconsistent with the corresponding LSRs. Of the 22 lines, five (22.7%) were flow-through and 17 (77.3%) were non-flow through.

Of the 55 directory listing orders, 34 were provisioned incorrectly, resulting in a 61.8% failure rate. Of the 34 orders, five (14.7%) listings were not listed in the database while 29 (85.3%) orders were listed incorrectly.

CSR verification is still being researched by both BellSouth and KCL.

Please see the following tables for details.

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SWITCH TRANSLATION VERIFICATION					
PON	TN	OCN	Switch Translations Discrepancy	VER	F/T
404R223PTM100002	(912) 746-1503	9994	No NST	AA	Y
404R223PTM100002	(912) 746-7577	9994	No NST	AA	Y
404R223PTM102001	(706) 823-0299	9994	No NST	AB	Y
404R223PTM102001	(706) 823-1802	9994	No NST	AB	Y
409R223PEM101001	(912) 755-9434	9990	No ESX	AA	Y
415R213PTM001002	(706) 303-9662	9990	Not working	AA	N
415R213PTM001002	(706) 303-2317	9990	Not working	AA	N
415R213PTM001002	(706) 303-2318	9990	Not working	AA	N
415R213PTM001002	(706) 303-2319	9990	Not working	AA	N
605R214PEJ000002	(912) 742-6359	9994	No NSD	AA	N
605R214PEJ000002	(912) 742-6728	9994	No NSD	AA	N
605R214PTJ000001	(706) 722-9484	9994	Wrong PIC & LPIC, no NSD	AA	N
605R214PTJ000001	(706) 722-9194	9994	Wrong PIC, no NSD	AA	N
625R214PTJ000002	(912) 746-4538	9990	Wrong PIC & LPIC, no Hunting	AB	N
625R214PTJ000002	(912) 746-5245	9990	Wrong PIC & LPIC, no Hunting	AB	N
625R214PTJ000002	(912) 746-6152	9990	Wrong PIC & LPIC, no Hunting	AB	N
625R214PTJ000003	(706) 774-1688	9990	Wrong PIC & LPIC	AB	N
625R214PTJ000003	(706) 774-6550	9990	Wrong PIC	AB	N
625R214PTJ000003	(706) 774-9891	9990	Wrong PIC	AB	N
625R214PTJ000005	(912) 746-0461	9990	Should not have NSQ	AA	N
625R214PTJ000005	(912) 746-1330	9990	Should not have NSQ	AA	N
625R214PTJ000005	(912) 746-7343	9990	Should not have NSQ	AA	N

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DIRECTORY LISTINGS VERIFICATION				
PON	TN	Directory Listing Discrepancy	Order Type	VER
301R112PEF000009	(706) 434-0845	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
305R112PEF100011	(706) 434-0808	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
305R112PEF101020	(706) 434-0851	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
305R112PTF002001	(706) 434-0806	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
305R112PTF100012	(912) 314-0807	Should be listed as Rwh but listed as R W H.	UNE-Analog Loop	1
305R112PTF100013	(404) 214-0684	Number is listed as "non-published" and "listed number". Should only be LN.	UNE-Analog Loop	2
307R122PEF001009	(404) 214-0685	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
307R122PEF001010	(912) 314-0809	Should be listed as RWH but listed as R W H.	UNE-Analog Loop	0
307R122PEF001011	(912) 314-0808	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
307R122PTF000008	(706) 434-0810	Should be listed as Rwh but listed as R W H.	UNE-Analog Loop	0
307R222PTF000005	(706) 434-0811	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
307R222PTF000006	(912) 314-0810	Should be listed as RWH but listed as R W H.	UNE-Analog Loop	1
319R122PEF101023	(706) 434-0849	Should be listed as Rwh but listed as RWH.	DL	2
319R122PTF000017	(706) 434-0848	Should be listed as Rwh but listed as RWH.	DL	0
319R122PTF000018	(478) 314-0821	Should be listed as Rwh but listed as RWH.	DL	1
328R312PTI000002	(912) 742-0979	Should be listed as Rwh but listed as RWH.	LLNP	0
330R222PEI000004	(706) 722-8897	No listing found, but should be listed as LN.	LLNP	0
350R112PTI000002	(706) 722-4544	Should be listed as RWH but listed as R W H.	LLNP	0
383R215PEG000004	(706) 722-1321	No listing found, but should be listed as NP.	LNP	0
383R215PEG000006	(912) 742-6976	No listing found, but should be listed as NP.	LNP	0
395R213PEM100002	(912) 746-6208	Should be listed as Rwh but listed as RWH.	Port Order	0
395R213PTM100001	(706) 828-6865	Should be listed as Rwh but listed as RWH.	Port Order	0

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DIRECTORY LISTINGS VERIFICATION				
PON	TN	Directory Listing Discrepancy	Order Type	VER
422R114PEJ100003	(404) 929-6480	Should be listed as Rwh but listed as RWH.	LPC	1
422R114PEJ101001	(706) 303-2412	Should be listed as Rwh but listed as RWH.	LPC	0
423R114PEJ101002	(912) 742-7604	Should be listed as Rwh but listed as RWH.	LPC	0
423R114PTJ100003	(404) 417-0398	Should be listed as Rwh but listed as RWH.	LPC	0
423R114PTJ101001	(706) 722-4464	Should be listed as Rwh but listed as RWH.	LPC	0
435R114PEJ001003	(478) 742-3853	Should be listed as Rwh but listed as RWH.	LPC	0
452R216PTF000002	(706) 774-9339	No listing found but should be listed as AL.	DL	0
605R214PEJ000002	(912) 742-6359	No listing found but should be listed as LN.	LPC	0
605R214PTJ000003	(404) 417-0464	Wrong TN information was brought up on the screen.	LPC	0
606R123PEM000003	(404) 321-4748	Should be listed as Rwh but listed as R W H.	Port Order	0
606R123PTM000004	(912) 742-9886	Should be listed as Rwh but listed as R W H.	Port Order	0
606R123PTM001002	(706) 724-0819	Should be listed as Rwh Enterprises but listed as Georgia R W H.	LPC	0

Impact:

Inaccurate provisioning will affect CLECs in the following way:

- Switch Translations -- customers not receiving features that were ordered
- Directory Listing - directory listings that are not listed or incorrectly listed will result in the CLEC customers either being omitted from the BellSouth-GA directories and/or Directory Assistance databases, or having their listings incorrectly listed.

Inaccurate provisioning will negatively affect CLEC-customer relationships through unmet expectations. A CLEC customer will receive the incorrect level or type of service, resulting in decreased customer satisfaction.

Date: December 8, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

Exception:

BellSouth has delivered Firm Order Confirmations (FOCs) in response to Local Service Requests (LSRs) that should have received error messages.

After an LSR is received by the BellSouth interface gateway, it proceeds through a series of order validations to ensure that the CLEC has adhered to business rule requirements documented by BellSouth. These documented requirements are intended to reflect the BellSouth system requirements for order processing. In response to a valid LSR, BellSouth returns an FOC, notifying the CLEC that its order is confirmed and providing a committed due date for completion of service provisioning. In the event an LSR contains an error, BellSouth should return an Error (ERR) or Clarification (CLR) notification.

In response to some KPMG Consulting LLC (KCL) LSRs containing data values populated contrary to business rule documentation, BellSouth delivered FOCs. After issuing confirmation, BellSouth proceeded to provision the service request, subsequently generating a Completion Notice (CN). BellSouth should have issued error messages in response to these service requests, allowing KPMG the opportunity to make corrections to ensure that service provisioning matches the service desired.

The following table provides detail on a sample of orders that should have received errors (as defined in the "Expected Results" column). All of these service requests were confirmed and completed (as noted in the "Actual Results" column).

PON*VER Company Code (CC)	Order Type	Actual Results	Expected Results
433A124PTJ100001*01 CC = 9991	MM Loop-Port Combination Inside Move	FOC/CN	According to BellSouth documentation, requests for feature changes are disallowed for this order type. An error message should have been received.
602A214PTJ100002*00 CC = 9991	MD Loop-Port Combination Partial	FOC/CN	According to BellSouth documentation, an activity type "D" should only be used for full (i.e., all of a

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BellSouth Georgia OSS Testing Evaluation

PON*VER Company Code (CC)	Order Type	Actual Results	Expected Results
	Disconnect		customer's lines) disconnect requests. Activity type "C" should be used for partial disconnects. KPMG issued a partial disconnect using a "D" activity type. An error message should have been received.
406C213PTO100012*06 CC = 9994	MV Full Migration As Specified	FOC/CN	On migration-as-specified service requests, the CLEC should enter feature detail information on those service features the customer wants to add or maintain on their line. Requests for feature deletion are performed via change orders. On this LSR, KPMG inserted a feature activity code of "D", for delete. An error message should have been delivered.
305A112PTH100001*18 9994	AV Full Migration to UNE Loop	FOC/CN	Service request did not contain a Q Acct for billing purposes. This request should have generated an error.
305A112PEH100003*00 9994	AV Full Migration to UNE Loop	FOC/CN	Service request did not contain a Q Acct for billing purposes. This request should have generated an error.
374A225PEG100006*00 9992	CV Stand Alone INP	FOC/CN	Service request did not contain a Q Acct for billing purposes. This request should have generated an error.
403A223PEM100002*00 9994	FV Full Migration to UNE Port	FOC/CN	Service request did not contain ADL FID or a DL form. This request should have generated an error.
408A313PEM000002*00 9991	FV Resale to UNE Port Conversion	FOC/CN	Service request contained duplicate TNs on REFNUM 0016 and 0017. This request should have received an error.
443A224PEM000002*00	MRS	FOC/CN	Based on BellSouth's <i>Local</i>

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PON*VER Company Code (CC)	Order Type	Actual Results	Expected Results
9991	Restore Service on a UNE Loop- Port Combination account		<i>Exchange Ordering Guide, Volume 1 (LEO Guide), the entry ("P") in the B11 field for this order type should have produced a Clarification response from BLS, not an FOC.</i>
606A123PTM101003*02 9991	FC TN Change for a UNE Port customer	FOC/CN	KPMG's BellSouth Customer Support Manager (CSM) informed KPMG that, on a "Change in Service for a Port" Order (Order Type "FB/C"), the LOCBAN field must be populated with the new TN in order to receive an FOC. KPMG received a FOC on this order when the LOCBAN field was populated incorrectly (i.e., it contained the customer's old TN).

Impact

The receipt of an FOC in response to an erred service request impacts CLECs in the following way:

- **Decrease in customer satisfaction.** After receiving a FOC, a CLEC assumes that all inputs on the LSR were valid, and that service will be provisioned exactly according to the LSR specifications. In cases where BellSouth inappropriately confirms and provisions service instead of issuing an error message, the service established for an end-user will differ from CLEC and end-user expectations (which were based on the incorrect LSR). The time required to diagnose the ordering problem and to re-issue the service request ultimately delays accurate provisioning of customer service. This delay will result in a decrease in customer satisfaction.

EXCEPTION 95 (Amended)
BellSouth Georgia OSS Testing Evaluation**Amended Exception (December 8, 2000)**

KCL is amending this exception to include a number of Local Service Requests (LSRs) from the Resale Functional Evaluation (PO&P-11). These orders were initially referred to in a provisioning-related exception, and have also been identified as having ordering errors. Although BellSouth has indicated that the following LSRs contained errors, KCL receive Firm Order Confirmations (FOCs) for each one. For invalid service requests, KCL expects to receive Clarification responses.

PON	VER	CC
R015A21PTN000011	00	9992
R015A21PTN000006	00	9992
R015A21PTN000005	00	9992
R015A21PTN000004	00	9992
R015A21PEN000012	00	9992
R015A21PEN000010	00	9992
R015A21PEN000009	00	9992
R015A21PEN000008	00	9992
R015A21PEN000007	00	9992
R015A21PEN000002	AC	9992
R015A12PEN100002	00	9991
R011F12PTN100038	BA	9992
R015A12PEN100003	BB	9992
R011B21PTN000002	00	9991

EXCEPTION 115 (Amended)
BellSouth Georgia OSS Testing Evaluation

December 5, 2000

EXCEPTION REPORT

An exception has been identified as a result of the xDSL Functional Evaluation (PO&P12).

Exception:

BellSouth does not respond to Loop Make-Up Service Inquiries (LMU/SI) within the specified seven-day interval.

According to the BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1)¹, available on the BellSouth Interconnection Service Web site, a CLEC should receive a response to an LMU/SI within seven working days.

As of August 28, 2000, 26 LMU/SIs submitted by the KCL Test CLEC (25% of the total LMU/SIs submitted) had not received a response within the specified seven day interval.

The following table provides details on the 26 LMU/SIs cited in this exception. These LMU/SIs were sent between July 10th and August 8th, 2000. As of August 28th, 2000 no responses had been received.

PON	Date Sent	Submitted via facsimile/email
X046A12002	7/10/2000	email
X046A110002	7/17/2000	email
X001P11004, X001P11006, X001P11007, X039A210001, X046P12007, X001P12006	7/18/2000	email
X039A11004, X039A12004	7/20/2000	email
X039P12006, X046BP11003, X046BP11004, X046BP11006, X046BP11007, X046BP11009, X046BP11010	7/21/2000	email
X0R03A, X0R04A, X0R05A, X0R06A, X0R08A, X0R09A, X0R011A, X0R012A, X0R014A	8/8/2000	facsimile

¹ BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1):
<http://www.interconnection.bellsouth.com/products/UNE/bstlmu.pdf>.

Impact:

The absence of timely responses to LMU/SIs Inquiry impact CLECs in the following ways:

- Decrease in customer satisfaction. A delay in the return of an LMU/SI will delay the ordering and provisioning of xDSL services. This will negatively impact CLEC customer satisfaction.
- Increase in operating costs. CLECs will also likely incur additional costs associated with researching the status of untimely LMU/SIs.

Date: October 19, 2000

EXCEPTION REPORT

An exception has been identified as a result of the TAG Pre-Order Functional Evaluation (PRE-1).

Exception:

Version 2.2.0.11 of BellSouth's TAG pre-order interface does not provide a Calculated Due Date (CDD) for UNE Loop-Port Combination service requests.

BellSouth's CDD pre-order query provides CLECs with the standard service provisioning interval for subsequent orders, based on the order requisition type (e.g., UNE Loop, UNE Port), activity type (e.g., disconnection, migration), quantity of lines, and product category identifier.

KPMG Consulting LLC (KCL) attempted to process a CDD for a UNE Loop-Port Combination request via TAG Version 2.2.0.11. Following the procedure outlined in the *Pre-Order Business Rules*, KCL populated the UNE Product Identifier field with a value of "0", representing a "NOTUNETOCALCULATE" entry¹. Since UNE Loop-Port Combinations do not fall under Resale service, KCL entered "NOTRSTOCALCULATE" in the Resale Product Identifier field².

KCL received the following error message via the TAG interface: "ILEC Exception, Invalid Data Exception – Invalid Data element: RSPROD, Error Code: TAG8008VAL, Msg Text: RSPROD REQUIRED."

The current Business Rules do not adequately explain the requirements for processing UNE Loop-Port Combination CDDs.

Impact

The inaccurate or incomplete Business Rule requirements for issuing CDDs on Loop-Port Combinations prohibit CLECs from processing electronic pre-orders for due date selection. This will impact a CLEC's pre-order and ordering process flow, and result in additional time to research pre-order errors.

¹ According to Version 7 of the *Pre-Order Business Rules* (p. 258), Loop Port Combinations utilize a UNEPROD indicator of "0".

² The Pre-Order Business Rules do not currently address requirements for the RSPROD field. See Observation XX for additional information.

Date: October 12, 2000

EXCEPTION REPORT

An exception has been identified as a result of the xDSL Functional Evaluation (PO&P12).

Exception:

BellSouth did not provide a Clarification/Rejection response to a Loop Make-Up (LMU) Service Inquiry within the specified seven-day interval.

According to the *BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1)*¹ from the Interconnect website, a CLEC should receive a Clarification/Rejection response to an LMU/SI within seven working days. KPMG Consulting LLC (KCL) submitted 16² LMU Service Inquiry forms with the following PONs and received the Clarification/Rejection response after the seven day interval:

PON	Date LMU/SI Sent	Date CLR/Reject Received
X0R01A	8/8/00	9/1/00
X0R02A	8/9/00	9/1/00
X0R04A	8/8/00	9/7/00
X0R05A	8/8/00	9/1/00
X0R08A	8/8/00	9/7/00
X0R10A	8/8/00	9/7/00
X0R12A	8/8/00	9/9/00
X0R34A	8/30/00	9/14/00
X0R35A	8/23/00	9/13/00
X0R36A	8/23/00	9/13/00
X0R39A	8/23/00	9/7/00
X0R40A	8/23/00	9/13/00
X0R43A	8/23/00	9/14/00
X0R44A	8/23/00	9/14/00
X0R48A	8/23/00	9/13/00
X0R52A	8/29/00	9/19/00

¹ BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1):

<http://www.interconnection.bellsouth.com/products/UNE/bstlmua.pdf>

² During functional testing, 152 LMU-SI/Local Service Requests were submitted to the BellSouth Complex Resale Support Group.

Impact:

The absence of a Clarification/Rejection response to an LMU Service Inquiry will delay the ordering of xDSL services. This will negatively impact customer satisfaction with the CLEC. The CLEC will also incur additional cost and time related to researching the status of the LMU.

Date: November 14, 2000

EXCEPTION REPORT

An exception has been identified as a result of the TAG and EDI Order Functional Re-test (O&P-1 and O&P-2).

Exception:

BellSouth failed to deliver Completion Notices (CNs) for several KPMG Consulting LLC (KCL) Local Service Requests (LSRs).

For the following 8 LSRs, BellSouth did not deliver CNs. KCL investigated these orders within BellSouth's web-based CLEC Service Order Tracking System (CSOTS). According to the CSOTS status reports, 5 of these LSRs are in CA (Cancelled) status. KCL did not issue orders to cancel the LSRs.

The following table provides details on the service orders currently affected by this issue.

PON*VER	Company Code (CC)	Req/Act	FOC DD	CSOTS Status¹
398R213PTM000001*00	9994	FV	9/5/2000	CA
303R222PEF001001*00	9991	JA	9/21/2000	CA
305R222PEH001001*00	9994	AV	9/25/00	CA
326R222PEH000002*00	9991	AV	9/22/00	PD
305R112PTF101003*02	9994	JA	9/22/00	CA
317R122PTH000001*01	9991	AM	9/29/00	CP
326R222PTH001001*00	9994	AV	9/25/00	CA
625R214PTJ000006*00	9990	MC	9/25/00	PD

¹ CP Status = Order is Complete. CA Status = Order is Cancelled. PD Status = Order is Pending Due Date.

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PON*VER	Company Code (CC)	Req/Act	FOC DD	CSOTS Status¹
301R112PTF100004*00	9994	J/A	10/6/00	CP
302R312PEF000006*00	9994	J/A	10/30/00	CP
302R312PTF100004*00	9991	J/A	10/30/00	CP
305R112PTF100009*00	9994	J/A	9/29/00	CP
305R112PTH000008*02	9994	A/V	10/16/00	PD
307R122PTF000006*01	9991	J/A	9/28/00	Not found
307R222PEH000001*02	9994	A/V	10/04/00	Not found
317R122PEH000004*01	9994	A/M	10/9/00	Not found
318R112PEH000001*00	9994	A/M	10/4/00	Not found
319R122PEF000015*03	9990	J/A	10/30/00	CA
320R212PEF102005*00	9991	J/A	10/16/00	CP
320R212PTF100008*01	9994	J/A	10/31/00	CP
440R124PTJ000002*00	9990	M/SS	9/9/00	CP
444R214PTJ100001*00	9990	M/D	9/5/00	PD
452R216PEF000003*00	9990	J/R	10/10/00	CP
454R126PEF000003*00	9990	J/R	10/10/00	CP
456R216PEF000002*00	9990	J/R	10/5/00	CP
456R216PTF000001*00	9990	J/R	10/5/00	CP
456R216PTF000003*00	9990	J/R	10/10/00	CP
615R122PTH100005*01	9994	A/A	10/25/00	PD

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PON*VER	Company Code (CC)	Req/Act	FOC DD	CSOTS Status¹
801R222PEI000003*00	7727 ²	B/W	10/12/00	Not found
801R222PTI001001*00	7727 ²	B/W	9/28/00	Not found

Impact

BellSouth's failure to notify a CLEC of completed orders creates confusion regarding order status. Missing CNs can create additional costs for CLECs because of the time required to research the status of a customer's order. In cases where the actual service completion has not occurred, CLECs' end users would be affected by a lack of timely service.

² Per the friendly CLEC participating in the LNP test, all TNs associated with this order have been ported.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 38



December 5, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Functional Tests (O&P-1 and O&P-2).

Exception:

BellSouth does not consistently provide CLECs with a service Due Date (DD) matching their Desired Due Date (DDD).

When issuing Local Service Requests (LSRs), CLECs are required to input a DDD for service completion. BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999* provides CLECs with standard completion intervals for different service types. In response to an error-free LSR, BellSouth delivers a Firm Order Confirmation (FOC). This FOC contains the DD by which BellSouth commits to completing the CLEC's service request. According to the *Interval Guide*, if a CLEC has requested a DDD no shorter than the standard interval, BellSouth will attempt to commit to the same DD¹.

Approximately 20% of KPMG's transactions had a DD that was not compliant with the interval specified in the *Interval Guide*. In these instances, BellSouth's FOC DDs can be broken down as follows:

- 1) BellSouth provided KPMG with an FOC DD later than the LSR DDD for 15% of service requests receiving an FOC. A table of these transactions appears below.

FOC DD Later than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
307A122PEK100001	04	9994	12/20/99	12/21/99	1	AB/V
395A213PEM100001	00	9994	1/21/00	1/24/00	1	FB/A
406A213PTM100001	00	9991	12/14/99	12/15/99	1	FB/V
406A213PTM100004	00	9991	1/21/00	1/24/00	1	FB/V
419A223PTM100002	00	9991	12/20/99	12/21/99	1	FB/D
428A124PTJ100006	01	9994	12/24/99	12/27/99	1	MB/V
428X224PEJ101001	00	9994	2/15/00	2/16/00	1	MB/V

¹ "BellSouth will make every effort to accommodate service requests utilizing these intervals." From BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999*, Page V

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 38

PON	VER	CC	LSR DDD	FOC DD	DD - DDD (Business Days)	REQTYP ACT
603A224PTJ100002	00	9991	11/16/99	11/20/99	1	MB/D
326C222PEI100002	00	9992	1/26/00	1/28/00	2	BB/V
404A223PTM100001	03	9991	12/09/99	12/13/99	2	FB/V
444A214PEJ000002	00	9991	1/21/00	1/25/00	2	MB/D
445A124PEJ100003	00	9991	1/14/00	1/18/00	2	MB/D
603A224PTJ100004	00	9991	2/16/00	2/18/00	2	MB/D
604A224PEJ000003	00	9994	2/7/00	2/09/00	2	MB/V
605A214PTJ000004	00	9994	2/15/00	2/17/00	2	MB/V
309A222PTH100001	04	9994	12/23/99	12/28/99	3	AB/V
626A224PTJ101002	00	9991	1/06/00	1/11/00	3	MB/C
445D124PEJ100001	00	9991	12/14/99	12/20/99	4	MB/D
329A212PTI100003	00	9992	12/21/99	12/28/99	5	BB/V
433A124PEH100002	00	9991	12/22/99	12/29/99	5	MB/M
603A224PEJ100003	00	9991	1/19/00	1/26/00	5	MB/D
440A124PTJ000002	00	9991	11/30/99	12/21/99	15	MB/SS

- 2) BellSouth provided KPMG with an FOC DD earlier than the LSR DDD for 5% of service requests receiving an FOC. A table of these transactions appears below.

FOC DD Earlier than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD - DDD (Business Days)	REQTYP ACT
395A213PEM100001	01	9994	1/21/00	1/18/00	-3	FB/A
415A213PTM000001	00	9991	12/14/99	12/09/99	-3	FB/RS
452A216PTF100003	00	9991	12/22/99	12/17/99	-3	JB/R
626A224PTJ100002	04	9991	12/16/99	12/13/99	-3	MB/C
407A213PTM100003	03	9991	12/09/99	12/07/99	-2	FB/C
456A216PEF100002	00	9991	12/22/99	12/20/99	-2	JB/R
606A123PEM100004	00	9991	2/17/00	2/15/00	-2	FB/C
438A214PTJ000002	00	9991	2/15/00	2/14/00	-1	MB/SS

Impact

CLECs should be reasonably assured of receiving confirmed due dates (FOC DD) matching their requested due dates (LSR DDD) when the requests are interval-compliant. CLECs are likely to provide their customers with an anticipated service delivery date in line with BellSouth's standard intervals. The receipt of an FOC DD different than an LSR DDD will force a CLEC to notify their customers of this change. Late DDs may result in decreased customer satisfaction. (e.g. a new account is not established on time, directory assistance information is not available on time).

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 38

The occurrence of an FOC DD earlier than the LSR DDD places an additional burden on a CLEC. Early completion of the CLEC's order may result in a disruption to the end user's service, (e.g. service is suspended prior to the customer's requested date, a new account is established and billing initiated prior to the customer's requested date) which will result in decreased CLEC customer satisfaction. To move the DD back to the requested DDD, the CLEC would be forced to issue a supplemental service request.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 38

AMENDED EXCEPTION (October 28, 2000)

KPMG reviewed the accuracy of FOC DDs provided on service requests submitted during a UNE functional re-test initiated on August 25, 2000.

Of the 197 FOCs² received during functional re-testing between August 28 and October 9, 2000, 17 (9%) contained DDs later than the DDD requested on the service request. One of these orders were submitted using pre-order obtained DDDs, while the remaining 16 orders were submitted using service intervals obtained from BellSouth documentation.

KCL performed an upgrade from TAG Version 2.2.0.8 to TAG Version 2.2.0.11 on October 5, 2000. The majority of pre-order and order transactions highlighted below were transmitted via Version 2.2.0.8.

The following table provides additional detail on the service orders receiving different Due Dates.

PON VER	CC	Order Type	Flow Through	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Documentation
615R122PTH100005*00	9994	AB/C	Y	10/11/00	10/16/00		X
423R114PTJ100003*00	9994	MB/V	Y	9/26/00	9/27/00		X
428R124PEJ100001*00	9994	MB/V	Y	9/4/00	9/5/00		X
423R114PTJ100001*00	9994	MB/V	Y *	9/4/00	9/5/00		X
444R214PTJ100001*00	9990	MB/D	Y *	9/4/00	9/5/00		X
398R213PTM000001*00	9994	FB/V	N	8/30/00	9/5/00		X
398R213PTM000003*00	9994	FB/V	N	9/8/00	9/13/00		X
399R213PTM100002*00	9994	FB/V	N	9/8/00	9/13/00		X
404R223PTM101001*01	9994	FB/V	N	9/11/00	9/14/00		X
404R223PTM100002*00	9994	FB/V	N	9/19/00	9/25/00		X
399R213PEM100001*01	9994	FB/V	N	9/1/00	9/6/00		X
398R213PEM000002*00	9994	FB/V	N	9/8/00	9/13/00		X
409R223PEM100001*00	9994	FB/C	N	9/19/00	9/21/00		X
409R223PEM100001*01	9994	FB/C	N	9/19/00	9/21/00		X

² This total excludes those FOCs received on KPMG LSRs submitted with Desired Due Dates less than the standard interval (i.e., KPMG errors).

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 38

PON VER	CC	Order Type	Flow Through	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Documentation
428R124PTJ100003*00	9994	MB/V	Y	9/20/00	9/21/00		X
395R213PEM100002*00	9994	FB/A	N	9/8/00	9/13/00		X
399R213PEM100003*00	9994	FB/V	N	9/26/00 ³	9/28/00	X	

Note: All Flow Through/Non-Flow Through classifications are based on *actual* designations from BellSouth-obtained flow through reports, with the exception of those marked by a *. For these orders, KPMG was unable to obtain a flow through classification based on BellSouth reports and utilized *expected* flow-through designations derived from BellSouth documentation.

³ For this transaction, the LSR was submitted within 30 minutes following the receipt of the associated pre-order responses. The Appointment Availability pre-order used indicated an "unavailable date" of 9/26/00. The correct input for the corresponding LSR DDD should have been 9/27/00 (the next available due date). BLS returned a FOC DD of 9/28/00.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 38

AMENDED EXCEPTION (November 22, 2000)

KCL is amending this exception to:

- a) Include the final results of the UNE functional re-test initiated on August 25, 2000.
- b) Include results from the Resale Functional Evaluation (PO&P-11).

UNE Re-Test⁴

Of the 287 FOCs⁵ received during functional re-testing between August 28 and November 15, 2000:

- 23 (8%) contained DDs different than the DDD requested on the LSR.
 - 19 (7%) of DDs were later than the DDD
 - 4 (1%) of DDs were earlier than the DDD.

The following table provides additional detail on the UNE Re-Test service orders receiving different Due Dates.

UNE Re-Test

PON VER	CC	Order Type	Flow Thro ugh	LSR DDD	FOC DD	DDD obtained via pre- orders	DDD obtained via Docume ntation	BellSouth Response
PONs from previous exception								
615R122PTH100005*00	9994	AB/C	Y	10/11/00	10/16/00		X	Disagree, PON processed in a timely manner. First available DD mechanically assigned.
423R114PTJ100003*00	9994	MB/V	Y	9/26/00	9/27/00		X	Disagree, PON processed in a timely manner. First available DD mechanically assigned.

⁴ KCL performed an upgrade from TAG Version 2.2.0.8 to TAG Version 2.2.0.11 on October 5, 2000. The majority of pre-order and order transactions highlighted in the UNE Re-test table were transmitted via Version 2.2.0.8.

⁵ This total excludes those FOCs received on KPMG LSRs submitted with Desired Due Dates less than the standard interval (i.e., KPMG errors).

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 38

PON VER	CC	Order Type	Flow Thro ugh	LSR DDD	FOC DD	DDD obtained via pre- orders	DDD obtained via Docume ntation	BellSouth Response
398R213PTM000001*00	9994	FB/V	N	8/30/00	9/5/00		X	Disagree, PON processed in a timely manner. First available DD mechanically assigned. LSR DDD was a Holiday.
398R213PTM000003*00	9994	FB	N	9/8/00	9/13/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
399R213PTM100002*00	9994	FB	N	9/8/00	9/13/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
404R223PTM101001*01	9994	FB	N	9/11/00	9/14/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
404R223PTM100002*00	9994	FB	N	9/19/00	9/25/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
399R213PEM100001*01	9994	FB	N	9/1/00	9/6/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 38

PON VER	CC	Order Type	Flow Thro ugh	LSR DDD	FOC DD	DDD obtained via pre- orders	DDD obtained via Docume ntation	BellSouth Response
398R213PEM000002*00	9994	FB	N	9/8/00	9/13/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
409R223PEM100001*01	9994	FB/C	N	9/19/00	9/21/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
428R124PTJ100003*00	9994	MB/V	Y	9/20/00	9/21/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
395R213PEM100002*00	9994	FB/A	N	9/8/00	9/13/00		X	Disagree, PON processed in a timely manner. First available DD mechanically assigned.
399R213PEM100003*00	9994	FB/V	N	9/26/00 ⁶	9/28/00	X		Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
PONs added to this exception								
320R212PEH100019*01	9994	AB/T	N	11/13/00	11/2/00		X	Disagree, KPMG changed LSR DDD on SUP 01 to cancel.

⁶ For this transaction, the LSR was submitted within 30 minutes following the receipt of the associated pre-order responses. The Appointment Availability pre-order used indicated an "unavailable date" of 9/26/00. The correct input for the corresponding LSR DDD should have been 9/27/00 (the next available due date). BLS returned a FOC DD of 9/28/00.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 38

PON VER	CC	Order Type	Flow Thro ugh	LSR DDD	FOC DD	DDD obtained via pre- orders	DDD obtained via Docume ntation	BellSouth Response
302R312PEH000003*00	9994	AB/A	N	10/23/00	10/30/00	X		Disagree, Due date negotiated per Project Manager. PON had more than 25 loops.
435R114PEJ001003*00	9990	MB/T	N	10/25/00	10/30/00	X		Agree, Service rep assigned incorrect DD.
615R122PTH001004*02	9994	AB/A	Y	10/31/00	10/24/00		X	Disagree, KPMG changed LSR DDD on SUP 01 to cancel.
511R212PTH000004*02	9994	AB/V	Y	10/6/00	10/5/00		X	Agree, Service Rep corrected DD on service order but failed to re-FOC with DD change.
301R112PTH001003*00	9994	AB/A	N*	11/20/00	11/22/00		X	Disagree, PON processed in timely manner. First available DD mechanically assigned.
404R223PTM102001*00	9994	FB/V	N	10/13/00	10/17/00		X	Agree, Service rep assigned incorrect DD.
615R122PTH001004*00	9994	AB/A	Y	10/19/00	10/24/00	X		Disagree, PON processed in timely manner. First available DD mechanically assigned.

Note: All Flow Through/Non-Flow Through classifications are based on *actual* designations from BellSouth-obtained flow through reports, with the exception of those marked by a *. For these orders, KPMG was unable to obtain a flow through classification based on BellSouth reports and utilized *expected* flow-through designations derived from BellSouth documentation.

Resale Test

Of the 259 FOCs⁷ received during the Resale Evaluation,

- 38 (15%) contained DDs different than the DDD requested on the LSR.
 - 14 (5%) of DDs were later than the DDD
 - 24 (9%) were earlier than the DDD.

⁷ This total excludes those FOCs received on KPMG LSRs submitted with Desired Due Dates less than the standard interval (i.e., KPMG errors).

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 38

The following table provides additional detail on the Resale Evaluation service orders
receiving different Due Dates.

Resale

PON VER	CC	Order Type	Flow Thro ugh	LSR DDD	FOC DD	DDD obtained via pre- orders	DDD obtained via Document ation	BellSouth Response
R041B21PEN100003* 00	9990	EB/A	Y	4/28/00	5/1/00	X		Agree, Mechanically assigned incorrect DD.
R005A12PEN100012* 00	9992	EB/V	Y	5/4/00	5/8/00	X		Agree, Mechanically assigned incorrect DD.
R001A11PEN100002* 00	9993	EB/W	N	3/17/00	3/20/00		X	Agree, service rep assigned incorrect DD.
R005E22PEN100003* 00	9990	EB/V	Y	3/3/00	3/6/00		X	Disagree, PON processed in timely manner. First available DD mechanically assigned.
R001A21PEN100003* 00	9991	EB/W	Y	2/24/00	2/28/00		X	Disagree, PON processed in timely manner. First available DD mechanically assigned.
R001X12PEN100002* 00	9993	EB/W	Y	4/24/00	4/25/00		X	Disagree, PON processed in timely manner. First available DD mechanically assigned.
R017A11PEN000005* 00	9991	EB/D	Y	3/31/00	4/4/00		X	Disagree, PON processed in timely manner. First available DD mechanically assigned.
R015A12PEN100002* 00	9991	EB/C	N	2/29/00	3/1/00		X	Disagree, PON processed in timely manner. First available DD mechanically assigned.
R035A12PTN000010* 00	9990	EB/W	N	4/26/00	4/27/00	X		Disagree, KPMG requested LSR DDD of 0 day interval.
R036A21PTN100004* 00	9990	EB/W	N	5/5/00	5/8/00	X		Disagree, FOC DD correct according to the Interval Guide
R010A11PTN100011* 01	9991	EB/C	N	5/11/00	5/13/00	X		Agree, service rep assigned incorrect DD.
R001A11PTN100001* 00	9993	EB/W	N	3/17/00	3/20/00		X	Agree, service rep assigned incorrect DD.
R029A21PTN001032* 02	9993	EB/A	Y	6/6/00	6/8/00		X	Disagree, KPMG changed DDD on SUP 01 to cancel.
R011F12PTN100015* 00	9992	EB/C	Y	3/24/00	3/27/00		X	Disagree, PON processed in timely manner. First available DD mechanically assigned

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 38

PON VER	CC	Order Type	Flow Thro ugh	LSR DDD	FOC DD	DDD obtained via pre- orders	DDD obtained via Document ation	BellSouth Response
R028D11PEN000002* 02	9990	EB/RS	Y	3/28/00	3/21/00		X	Disagree, KPMG changed LSR DDD on SUP 01 to cancel.
R025A11PEN100009* 00	9992	EB/M	N	3/21/00	3/20/00		X	Agree, Service rep assigned incorrect DD.
R025A11PEN100005* 00	9992	EB/M	N	3/23/00	3/22/00		X	Agree, service rep assigned incorrect DD.
R025A11PEN100003* 00	9992	EB/M	N	3/21/00	3/17/00		X	Agree, service rep assigned incorrect DD.
R025A11PEN100001* 02	9992	EB/M	N	3/21/00	3/17/00		X	Agree, Service rep assigned incorrect DD.
R010A21PEN100004* 02	9993	EB/C	N	3/25/00	3/21/00		X	Agree, service rep assigned incorrect DD.
R010C11PEN100001* 01	9991	EB/C	Y	5/16/00	5/15/00		X	Agree, Mechanically assigned incorrect DD.
R011A21PEN000002* 01	9991	EB/C	N	6/3/00	5/26/00		X	Agree, service Rep error. Rep failed to RE-FOC DD correction
R018A21PEN000008* 00	9991	EB/C	N	3/17/00	3/11/00		X	Agree, service rep assigned incorrect DD.
R025X11PTN100002* 01	9991	EB/M	Y	3/20/00	3/18/00		X	Agree, Mechanically assigned incorrect DD.
R010A11PTN100005* 01	9992	EB/C	N	3/29/00	3/28/00		X	Agree, service rep assigned incorrect DD.
R010A21PTN100001* 04	9993	EB/C	N	4/4/00	3/29/00		X	Agree, service rep assigned incorrect DD.
R011A21PTN000001* 00	9991	EB/C	N	5/25/00	5/23/00		X	Agree, service rep assigned incorrect DD.
R006C22PTN001001* 00	9992	EB/V	N	4/28/00	4/24/00		X	Agree, service rep assigned incorrect DD.
R002A21PTN100001* 05	9992	EB/V	N	3/27/00	3/23/00		X	Agree, service rep assigned incorrect DD.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 38

PON VER	CC	Order Type	Flow Thro ugh	LSR DDD	FOC DD	DDD obtained via pre- orders	DDD obtained via Document ation	BellSouth Response
R017D11PTN100005* 02	9991	EB/D	N	3/23/00	3/20/00		X	Agree, Mechanically assigned incorrect DD.
R018A21PTN000007* 00	9991	EB/C	N	3/17/00	3/11/00		X	Agree, service rep assigned incorrect DD.
R018B21PTN000002* 00	9990	EB/C	N	3/21/00	3/15/00		X	Agree, service rep assigned incorrect DD.
R025A11PTN100002* 00	9992	EB/M	N	3/23/00	3/21/00		X	Agree, service rep assigned incorrect DD.
R025A11PTN100004* 00	9992	EB/M	N	3/21/00	3/17/00		X	Agree, service rep assigned incorrect DD.
R025A11PTN100006* 00	9992	EB/M	N	3/23/00	3/21/00		X	Agree, service rep assigned incorrect DD.
R025A11PTN100008* 00	9992	EB/M	N	3/21/00	3/20/00		X	Agree, service rep assigned incorrect DD.
R025A11PTN100010* 00	9992	EB/M	N	3/23/00	3/21/00		X	Agree, service rep assigned incorrect DD.
R025X11PTN100002* 00	9991	EB/M	N	3/20/00	3/18/00		X	Agree, service rep assigned incorrect DD.

Additional BellSouth Response

BellSouth's responses to the individual occurrences have been incorporated into the above table.

BellSouth has completed a thorough review of the Products & Services Interval Guide. This Guide will be updated on the BellSouth web site on 12/15/00 with an effective date of 1/15/01. Process documents used by BellSouth service reps are reviewed and modified as needed to ensure consistency with the Guide. Service reps will be covered on the new Guide prior to the 1/15/01 effective date. Change requests have been opened to ensure electronic pre-order functionality, ordering functionality and the Products & Services Interval Guide are consistent. Implementation will be communicated through the change control process.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 68



December 7, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

Exception:

BellSouth does not provide complete Firm Order Confirmation (FOC) and Completion Notice (CN) responses.

In response to a valid Local Service Request (LSR), BellSouth generates a FOC, notifying the CLEC of order confirmation and a committed due date. BellSouth transmits a CN to notify the CLEC upon completion of provisioning activities.

BellSouth's *Local Exchange Ordering Implementation Guide*¹ (*LEO Guide*) provides information on the data content and format that will be returned within the FOC and CN responses via EDI. The *LEO Guide* also contains a list of data elements, or fields, that should be present on the response. The *LEO Guide* also contains information on fields that must be populated with data values - based on the specific LSR's Requisition (REQ) and Activity (ACT) type - and on the format characteristics (e.g., nine alpha characters) of those data values.

BellSouth's *TAG API Reference Guide*² (*API Guide*) provides information on the data elements that will be returned within the FOC and CN responses via TAG. The *API Guide* does not contain information on data value usage and format requirements. BellSouth provides this data value information in the *LEO Guide*, which provides ordering business rules for both the TAG and EDI interfaces.

Based on a detailed comparison of a sample of FOCs and CNs received from both the TAG and EDI interfaces to the data value information specified in the *LEO Guide*, KPMG Consulting LLC (KCL) noted deficiencies in response completeness. These deficiencies fall into five categories:

1. *Missing Data Elements*

The FOC or CN does not contain fields listed in the BellSouth documentation.

2. *Extraneous Data Elements*

The FOC or CN contains fields not listed in the BellSouth documentation.

¹ For purposes of this evaluation, KPMG utilized *LEO Guide, Version 7N*.

² For purposes of this evaluation, KPMG utilized *API Guide, Version 2.2.0.7*.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 68

3. *Missing Data Values*

The FOC or CN does not contain data values in one or more fields. According to the BellSouth documentation, these fields are required to be populated based on the order's REQ/ACT type.

4. *Extraneous Data Values*

The FOC or CN contain data values in one or more fields that are prohibited or not applicable according to the BellSouth documentation.

5. *Incorrect Data Values*

The data values populated on a FOC or CN are inaccurate with respect to field format or content, based on rules identified in the BellSouth documentation.

The following tables present the response completeness deficiencies identified by KCL. Results are broken down by response type (FOC or CN) and by ordering interface (TAG or EDI).³ For each category defined above, the table presents a list of those data elements and data values identified with problems, and a percentage of responses affected. For missing, extraneous, or incorrect data values, KCL also provides a reference to the relevant REQ/ACT type data requirements.

³ For the purpose of this response completeness evaluation, KPMG reviewed a sample of 30 responses for each category (FOCs via EDI, FOCs via TAG, CNs via EDI, CNs via TAG).

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 68

FOC Responses

	Data Elements	% of Responses Affected	Data Values	% of Responses Affected	Interface
Missing	N/A	N/A	<ul style="list-style-type: none"> Billing Indicator 1 (BI1) Billing Account Number 1 (BAN1) Version (VER) Frame Due Time (FDT) 	<ul style="list-style-type: none"> 17%⁴ 100%⁵ 39%⁶ 100%⁷ 	EDI
Extraneous	<ul style="list-style-type: none"> REMARKS-TYPE 	100%	<ul style="list-style-type: none"> Channel Pair (CHAN-PAIR) 	23%	EDI
Incorrect	N/A	N/A	<ul style="list-style-type: none"> Representative Telephone Number (REP-TEL) 	100% ⁸	EDI
Missing	N/A	N/A	<ul style="list-style-type: none"> Frame Due Time (FDT) 	100%	TAG
Extraneous	<ul style="list-style-type: none"> ACSTATIONRANGE STATUSCODE STATUSMSG 	<ul style="list-style-type: none"> 100% 100% 100% 	<ul style="list-style-type: none"> Exchange Company Circuit ID (ECCKT) Local Service Request Number (LSR NO) 	<ul style="list-style-type: none"> 13%⁹ 10% 	TAG
Incorrect	N/A	N/A	<ul style="list-style-type: none"> Representative Telephone Number (REP-TEL) 	100%	TAG

CN Responses

	Data Elements	% of Responses Affected	Data Values	% of Responses Affected	Interface
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⁴ REQ/ACT Type of BV

⁵ Required for all valid REQ/ACT Types

⁶ Required for all valid REQ/ACT Types

⁷ Required for all valid REQ/ACT Types

⁸ According to BellSouth documentation, the REP-TEL phone number should be 10 numeric characters. However, this field was found to contain hyphens and an incomplete phone number.

⁹ Required for REQ/ACT types AC,AD,AM,AT,AR,AV, and BV

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 68

Missing	<ul style="list-style-type: none"> Frame Due Time (FDT) Telephone Number (Ported) (TNPORTED) 	<ul style="list-style-type: none"> 100% 33% 	<ul style="list-style-type: none"> Billing Account Number 1 (BAN1) Frame Due Time (FDT) 	<ul style="list-style-type: none"> 100% 100% 	EDI
Extraneous	REMARKS-TYPE	100%	<ul style="list-style-type: none"> Exchange Company Circuit ID (ECCKT) Local Service Request Number (LSR NO) Channel Pair (CHAN-PAIR) 	<ul style="list-style-type: none"> 13% 50% 27% 	EDI
Incorrect	N/A	N/A	Representative Telephone Number (REP-TEL)	100%	EDI
Missing	N/A	N/A	Frame Due Time(FDT)	80%	TAG
Extraneous	<ul style="list-style-type: none"> ACTSTATION RANGE TRANSETPUR POSECD STATUS CD - STATUS MSG 	<ul style="list-style-type: none"> 100% 100% 100% 	N/A	N/A	TAG
Incorrect	N/A		Representative Telephone Number (REP-TEL)	77%	TAG

Impact

Incomplete FOCs and CNs delivered in response to valid LSRs will impact CLECs in the following ways:

- Increase in operating costs.** Extraneous information may cause confusion for CLEC ordering representatives. More seriously, missing or incorrect data elements and data values may not provide the necessary account information to the CLEC. If a CLEC does not receive necessary account information, contacting BellSouth to obtain the information will require additional CLEC resources. Utilizing additional resources will result in an increase in CLEC operating costs.
- Decrease in customer satisfaction.** If a CLEC does not receive necessary account information, such as frame due time, provisioning activities may be affected. Any provisioning delays that result from this lack of information will decrease CLEC customer satisfaction.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 68

Amended Exception:

To address some of the issues presented in this exception, as well as an issue presented in Exception 75 (BellSouth documentation did not contain Business Rules for Error, Clarification, Jeopardy, and Status response types), BellSouth issued an updated version of its *LEO Guide, Volume 1* on August 28, 2000.

In the modified documentation, BellSouth includes Business Rules for all response types (errors, confirmations, completions, status messages, and jeopardizes) in a single section. BellSouth includes a table that identifies the data elements (fields) that are applicable to each response type. While the current Business Rules for BellSouth responses accurately reflect the data elements returned on each response type, the documentation does not provide an adequate definition of *usage requirements*, by order type, for population of all elements. For a number of fields, the documentation describes the location within BellSouth service order detail from where the response data will come. The documentation fails to consistently note under what circumstances (i.e., order types) BellSouth service orders will contain such information, and therefore when corresponding data elements will be populated on order responses delivered to CLECs.

The following table provides a sample of the data elements containing incomplete usage requirements.

Data Element	Description	KCL Comments
ORD (Order Number)	This information is obtained from the service order field in the fielded IDENT section and provided in the ORD field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
RORD (Related Order Number)	This information is obtained from the service order FID CRO in the unfielded IDENT section and provided in the RORD field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
FDT (Frame Cutover Time)	This information is obtained from the service order, behind the LH FID FDT in the unfielded IDENT section. This information will be converted to military time and provided in the FDT field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
EBD (Effective Bill Date)	This information is obtained from behind the IEBD LH FID in the bill section on the service order and returned to the EBD field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 68

Data Element	Description	KCL Comments
LOCBAN (Local Billing Account Number)	This information is obtained from the TN in the fielded IDENT section on the service order and is populated on the IDENT field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
BAN1 (Billing Account Number 1)	The BTN information is provided from behind the BTN field in the Bill Section on the service order. On REQ TYPE B, this will be the BTN from the Interim Number Portability Order and not the Loop Order. This information will be populated on the BAN1 field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only for REQ TYPE B.
BAN2 (Billing Account Number 2)	On a non-designed loop, this information is obtained from the BTN field in the Bill Section of the service order. This field will be used only for REQ TYPE B. It will always come from the Loop order. This information is populated in the BAN 2 field on the 855/865. On a designed loop, this information is obtained from behind the TN field in the fielded IDENT section of the service order and populated in the BAN 2 field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only for REQ TYPE B.

Second Amended Exception (November 21, 2000)

KCL is amending this exception to include incomplete responses for additional response types. BellSouth has returned incomplete Jeopardy Notifications and Missed Appointment Notifications (Status Messages) relative to the requirements outlined in the *Local Exchange Ordering Guide, Volume 1, Issue 7S*. The following table identifies those fields that KCL failed to receive on responses. According to BellSouth documentation, these fields were required. For each PON listed, all fields identified were missing.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 68

Response Type	PON*VER	CC	Missing Fields	BellSouth Response
Jeopardy	301A112PTH100009*03	9994	REFNUM	Field was populated on response.
	309A122PTH100009*00	9994	ECCKT	Field was populated on response.
	317A122PTH101001*00	9991	ERROR-CODE	This field not applicable for Jeopardy per LEO IG Vol. 1.
	424A314PTJ000001*02	9994	ERROR-MSG	This field not applicable for Jeopardy per LEO IG Vol. 1.
	607A214PTJ101003*00	9991	CKR	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1
	302A312PEH000003*01	9994	CFA	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1
	305A112PEH100003*00	9994	L-ORD	Field was populated on response
	305A222PEH101001*06	9994	PORTED	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1
	432A214PEJ100006*02	9991	CABLEID	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1
	607A214PEJ103001*05	9991	SHELF	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1
			SLOT	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 68

Response Type	PON*VER	CC	Missing Fields	BellSouth Response
Jeopardy	607A214PEJ103001*05	9991	CHAN-PAIR	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1
			OTN	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1
Missed Appointment	301A222PTH103001*11	9994	REFNUM	Field was populated on response.
	350A112PTI100001*04	8758	ECCKT	Field was populated on response.
	351A212PTI000001*02	8758	ERROR-CODE	This field not applicable for missed appointment status per LEO IG Vol. 1.
	801A222PTI100006*00	7125	ERROR-MSG	This field not applicable for missed appointment status per LEO IG Vol. 1.
	305R112PEH000006*00	9991	CKR	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1
	315R212PEH000003*02	9991	CFA	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1
	435R114PEJ000001*04	9990	L-ORD	Loop Order Number (L-ORD) field not applicable for REQ TYP MB per LEO IG Vol. 1
			PORTED	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1
			CABLEID	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 68

			SHELF	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1
			SLOT	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1
			CHAN-PAIR	Field taken from LSR. This field is populated on response when sent on original LSR per LEO IG Vol. 1
			OTN	Field was populated on response.

BellSouth Response to Second Amendment

BellSouth disagrees with KPMG's second amended exception findings concerning Jeopardy and Missed Appointment status transactions. All fields applicable for Jeopardy and Missed Appointment Status transactions were sent to KPMG. BellSouth's LEO IG Volume 1 provides usage information for each field listed in the above table of the second amendment.

BellSouth agrees with KPMG's findings regarding the data elements returned on responses. The current LEO IG accurately reflects the data elements returned on each response type and the location within BellSouth service order detail or the LSR field from where the response data will come. Current LEO IG documentation facilitates a CLEC's ability to understand and utilize the information included in each response transactions.

BellSouth will further enhance the LEO IG Volume 1 to include additional usage information for response transactions. The LEO IG enhancement requested by KPMG will be published on the BellSouth web site by 1/31/01.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 77



December 8, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

Exception:

BellSouth does not deliver timely fully mechanized Clarification (CLR) responses.

Background: In response to a valid Local Service Request¹ (LSR) that contains an error, BellSouth returns a CLR to the CLEC. A CLR is generated in one of two ways:

1. Fully Mechanized

A fully mechanized CLR, or auto clarification, is a system-generated error message.

2. Partially Mechanized

A partially mechanized CLR is generated by a BellSouth ordering representative after an electronically submitted service request falls out for manual handling in the Local Carrier Service Center (LCSC).

BellSouth commits to returning 95% of CLRs for fully mechanized service requests within one hour and to returning 85% of CLRs for partially mechanized service requests within 48 hours.²

BellSouth Performance³: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely fully mechanized CLR responses.

- 92% of fully mechanized CLRs were returned via the TAG interface within the specified timeframe⁴.
- 17% of fully mechanized CLRs were returned via the EDI interface within the specified timeframe⁵.

¹ According to the *BellSouth-Georgia Service Quality Measurements (SQMs), Draft Version 1.4, p.14*, a service request is not considered valid until it passes system edits to ensure all required fields are populated. An "Invalid" LSR will be returned to a CLEC as a Fatal Reject.

² These timeliness standards, proposed by BellSouth, have not yet been approved by the Georgia Public Services Commission.

³ This exception includes data for LSRs submitted through April 21, 2000. All Local Number Portability (LNP) service requests are *excluded* from this data set. Information on fully versus partially mechanized CLR responses for LNP orders was not provided to KPMG.

⁴ Response timeliness did not significantly improve after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness of response issues. For fully mechanized CLRs received between 2/8/00 and 4/21/00, 93% were returned within one hour via TAG.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 77

The following tables provide a detailed breakdown of response time for fully mechanized and partially mechanized CLR⁶s.

Fully Mechanized CLR Timeliness Summary

CLRs Received via TAG						
<1 hr	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	24-48 hrs	>48 hrs
95	2	0	3	1	2	0
92.2%	1.9%	0%	2.9%	1.0%	1.9%	0.0%
CLRs Received via EDI						
<1 hr	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	24-48 hrs	>48 hrs
15	59	5	5	2	0	1
17.2%	67.8%	5.7%	5.7%	2.3%	0.0%	1.1%

Fully Mechanized CLR Detail – Untimely TAG CLR⁵s

PON	VER	CC	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	24-48 hrs
382A225PTH101002	00	9992	X				
382A225PTH100002	00	9992	X				
305A122PTH101002	00	9994			X		
305A122PTH101001	05	9994			X		
305A112PTH100001	17	9994			X		
307X222PTH101001	05	9994				X	
305A122PTH100002	03	9994					X
395A213PTH100002	00	9994					X

⁵ Response timeliness did not improve after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness issues. For fully mechanized CLR⁶s received between 2/8/00 and 4/21/00, 15% were received within one hour.

⁶ KPMG used Actual Flow Through data (provided from BellSouth as part of the Flow Through Evaluation) to determine whether CLR⁶s were fully or partially mechanized.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 77

Fully Mechanized CLR Detail – Untimely EDI CLR's

PON	VER	CC	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	> 24 h
303A222PEH101001	0	9994	X				
378A315PEI001001	0	9992	X				
626A224PEJ100003	0	9991	X				
305A222PEH100001	2	9994	X				
607A214PEJ103002	0	9991	X				
607A214PEJ101001	0	9991	X				
301A212PEH100001	0	9994	X				
315A212PEH100024	0	9994	X				
420A124PEJ100008	0	9994	X				
307A122PEH100005	0	9994	X				
307A122PEH100003	1	9994	X				
324A112PEH100002	2	9991	X				
324A112PEH101005	0	9991	X				
433A127PEH000004	0	9994	X				
309A122PEH100007	0	9994	X				
308F312PEH102001	0	9994	X				
303A222PEH101001	1	9994	X				
324A112PEH100002	0	9991	X				
305A222PEH100001	1	9994	X				
308F312PEH100001	0	9994	X				
607C214PEJ100001	0	9991	X				
305A222PEH101001	0	9994	X				
315X212PEH100001	0	9991	X				
305A122PEH100010	1	9994	X				
309A122PEH101001	0	9994	X				
324A112PEH100003	0	9991	X				
324A112PEH100002	1	9991	X				
626A224PEJ100012	0	9991	X				
309A122PEH101001	6	9994	X				
305A212PEH100004	0	9994	X				
323A122PEH100006	1	9991	X				
323A122PEH100006	2	9991	X				
600A212PEH000002	0	9994	X				
326A212PEI100003	0	9992	X				
323A122PEH100006	0	9991	X				
324A112PEH100003	1	9991	X				
305A222PEH100009	0	9994	X				
607A214PEJ100001	0	9994	X				
620A212PEH101004	0	9991	X				

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 77

PON	VER	CC	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	> 24 h
305A222PEH100001	0	9994	X				
420A124PEJ100001	0	9994	X				
606A123PEM101006	0	9991	X				
604D224PEJ000001	0	9994	X				
600A212PEH001001	0	9994	X				
615A122PEF100013	0	9991	X				
625A214PEJ100005	2	9991	X				
422A114PEJ101001	2	9994	X				
625A214PEJ100005	0	9991	X				
378A315PEI001001	3	9992	X				
308F312PEH100001	1	9994	X				
308F312PEH101001	0	9994	X				
409X223PEM101001	0	9991	X				
608A124PEJ100004	1	9991	X				
303A222PEH100003	0	9994	X				
305A122PEH100010	0	9994	X				
608A124PEJ100004	0	9991	X				
626A224PEJ100011	0	9991	X				
422A114PEJ100001	0	9994	X				
301A212PEF101007	0	9994	X				
625A214PEJ100004	0	9991		X			
615A122PEH100010	0	9991		X			
382D225PEG100005	0	9991		X			
307A122PEH100003	0	9994		X			
607A214PEJ103002	4	9991		X			
311A212PEH101001	0	9994			X		
301A112PEF100007	4	9994			X		
315A212PEH100024	1	9994			X		
305A212PEH101004	0	9994			X		
606A123PEM100006	2	9991			X		
307A122PEH101003	0	9994				X	
305A122PEH101010	0	9994				X	
428X224PEJ100001	0	9994					X

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 77

Amended Exception

KCL initiated a UNE functional re-test on August 25, 2000. Based on results through November 8, KCL has received Fully-mechanized error (FM ERR/CLR) responses from BellSouth outside of the standard response time⁷. Of the 22 FM errors delivered via TAG, 68% were received on time (within 1 hour). Of the 108 FM errors delivered via EDI, 64% were received on time.

TAG FM Response Timeliness					
< 1 hr	1-2 hrs	2-4 hrs	12-24 hrs	48-72 hrs	TOTAL
15	2	1	2	2	22
68%	9%	5%	9%	9%	100%
EDI FM Response Timeliness					
< 1 hr	1-2 hrs	2-4 hrs	12-24 hrs	48-72 hrs	TOTAL
69	37	2	--	--	108
64%	34%	2%	--	--	100%

The following tables provide detail associated with those PONs receiving late FM error responses.

TAG					
PON*VER	CC	Date Sent	Response Rcvd	Response Category	BellSouth Response
305R112PTF101002*00	9991	9/15/2000 11:29:26 AM	9/15/2000 12:36:00 PM	1-2 hrs	Rec 9/15 10:37 Clar 9/15 11:01
305R112PTF101002*00	9991	9/15/2000 3:02:06 PM	9/15/2000 4:13:28 PM	1-2 hrs	Rec 09/15 2:18 Rej 09/15 2:45
350R112PTI000002*00	7727	10/12/2000 4:51:33 PM	10/12/2000 8:14:38 PM	2-4 hrs	Rec 10/12 4:52 Rej 10/12 4:52 Apparent KPMG TAG listener problem
333R122PTI000001*00	7727	8/30/2000 8:46:45 AM	8/31/2000 5:21:14 AM	12-24 hrs	Rec 8/30 8:47 Rej 8/30 8:47 Apparent KPMG TAG listener problem
354R212PTI000002*00	7727	10/2/2000 6:20:16 PM	10/3/2000 6:35:55 AM	12-24 hrs	Rec 10/02 6:21 Rej 10/02 6:21 Apparent KPMG TAG listener problem
440R124PTJ000001*00	9990	8/28/2000 12:06:46 PM	8/30/2000 5:08:29 PM	48-72 hrs	Rec 8/28 11:07 Rej 8/28 11:07 Apparent KPMG TAG listener problem

⁷ The Georgia Public Service Commission (GPSC) standard for purposes of this evaluation, adopted on June 6, 2000, is 95% of FM errors within 1 hour.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 77

TAG					
PON*VER	CC	Date Sent	Response Rcvd	Response Category	BellSouth Response
801R222PTI000001*00	7727	8/28/2000 6:50:40 PM	8/31/2000 5:49:15 AM	48-72 hrs	Rec 08/28 6:51 Rej 08/28 6:51 Apparent KPMG TAG listener problem

EDI					
PON*VER	CC	Date Sent	Response Rcvd	Response Category	BellSouth Response
305R112PEF101020*00	9991	10/16/2000 3:22:00 PM	10/16/2000 4:27:37 PM	1-2 hrs	Rec 10/16 2:36 Clar 10/16 3:01
305R112PEF100020*00	9991	10/6/2000 11:08:24 AM	10/6/2000 12:14:43 PM	1-2 hrs	
305R112PEF100020*00	9991	10/4/2000 2:20:10 PM	10/4/2000 3:28:28 PM	1-2 hrs	
320R212PEF100005*00	9991	10/3/2000 5:14:28 PM	10/3/2000 6:14:30 PM	1-2 hrs	
320R212PEF100005*00	9991	10/2/2000 2:37:27 PM	10/2/2000 3:55:41 PM	1-2 hrs	Rec 10/2 1:48 Clar 10/2 2:32
309R122PEH000002*00	9994	9/28/2000 9:16:33 AM	9/28/2000 10:16:29 AM	1-2 hrs	
307R222PEH000001*00	9994	9/22/2000 10:32:51 AM	9/22/2000 11:38:42 AM	1-2 hrs	
323R122PEH001001*00	9991	9/19/2000 2:58:52 PM	9/19/2000 4:09:00 PM	1-2 hrs	
323R122PEH001001*00	9991	9/15/2000 10:43:36 AM	9/15/2000 11:53:28 AM	1-2 hrs	
315R212PEH000002*00	9991	9/15/2000 10:12:45 AM	9/15/2000 11:53:28	1-2 hrs	
323R122PEH000001*00	9991	9/14/2000 1:10:59 PM	9/14/2000 2:13:37 PM	1-2 hrs	
305R112PEH000002*00	9991	9/6/2000 3:46:36 PM	9/6/2000 4:51:12 PM	1-2 hrs	Rec 9/6 3:01 Clar 9/6 3:30
305R112PEH000002*00	9991	9/6/2000 11:20:53 AM	9/6/2000 12:27:29 PM	1-2 hrs	Rec 9/6 10:41 Clar 9/6 11:02
319R122PEH000001*00	9990	10/5/2000 1:47:54 PM	10/5/2000 2:51:32 PM	1-2 hrs	
318R112PEH000004*00	9994	9/28/2000 1:20:45 PM	9/28/2000 2:31:18 PM	1-2 hrs	
432R214PEJ000001*00	9990	8/30/2000 12:13:30 PM	8/30/2000 1:24:27 PM	1-2 hrs	
454R126PEF001001*00	9990	9/5/2000 1:18:09 PM	9/5/2000 2:18:43 PM	1-2 hrs	
452R216PEF000001*00	9990	8/25/2000 12:20:33 PM	8/25/2000 1:27:51 PM	1-2 hrs	
435R114PEJ000003*00	9990	10/4/2000 9:11:33 AM	10/4/2000 10:15:38 AM	1-2 hrs	

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 77

PON*VER	CC	Date Sent	Response Rev'd	Response Category	BellSouth Response
307R122PEF000003*00	9991	9/19/2000 10:50:23 AM	9/19/2000 11:50:18 AM	1-2 hrs	
307R122PEF000003*00	9991	9/14/2000 10:27:27 AM	9/14/2000 11:41:47 AM	1-2 hrs	
303R222PEH000002*00	9994	9/25/2000 3:00:14 PM	9/25/2000 4:04:43 PM	1-2 hrs	
307R122PEF000009*00	9994	10/5/2000 11:33:52 AM	10/5/2000 12:37:54 PM	1-2 hrs	
307R122PEH000005*00	9994	9/28/2000 12:48:59 PM	9/28/2000 1:50:25 PM	1-2 hrs	
307R122PEH000003*00	9991	9/20/2000 2:16:21 PM	9/20/2000 3:29:52 PM	1-2 hrs	
305R222PEH000001*00	9994	8/25/2000 11:45:14 AM	8/25/2000 12:50:04 PM	1-2 hrs	
318R112PEH000001*02	9994	9/19/2000 3:04:39 PM	9/19/2000 4:09:00 PM	1-2 hrs	
319R122PEF000016*00	9990	10/18/2000 10:46:26 AM	10/18/2000 11:50:39 AM	1-2 hrs	
329R212PEI000001*01	7727	8/28/2000 12:02:15 PM	8/28/2000 2:34:06 PM	2-4 hrs	Rec 8/28 2:08 Rej 8/28 2:08
329R212PEI001001*00	7727	8/28/2000 3:51:20 PM	8/28/2000 5:54:47 PM	2-4 hrs	Rec 8/28 5:15 Rej 8/28 5:15
329R212PEI002001*00	7727	9/15/2000 10:12:45 AM	9/15/2000 11:12:57 AM	1-2 hrs	
330R222PEI000002*00	7050	9/14/2000 9:54:30 AM	9/14/2000 10:55:19 AM	1-2 hrs	
330R222PEI000003*00	7050	10/16/2000 8:59:09 PM	10/16/2000 10:03:05 PM	1-2 hrs	
349R212PEI000003*00	7050	9/26/2000 10:28:58 AM	9/26/2000 11:35:04 AM	1-2 hrs	
409R223PEM100001*00	9994	9/14/2000 11:22:13 AM	9/14/2000 12:30:36 PM	1-2 hrs	Rec 9/14 10:43 Rej 9/14 11:00
428R124PEJ100001*00	9994	8/28/2000 3:52:37 PM	8/28/2000 5:11:05 PM	1-2 hrs	
452R216PEF000001*02	9990	9/5/2000 1:14:28 PM	9/5/2000 2:18:43 PM	1-2 hrs	
454R126PEF000001*00	9990	8/29/2000 11:14:36 AM	8/29/2000 12:18:08 PM	1-2 hrs	
606R123PEM000003*00	9990	9/20/2000 9:25:32 AM	9/20/2000 10:28:55 AM	1-2 hrs	

KCL has also amended this exception to include the results of the Resale Functional Evaluation (PO&P-11). KCL experienced similar response timeliness problems with the delivery of EDI Fully-Mechanized errors on Resale service requests as those uncovered during the UNE evaluations (O&P-1 and O&P-2).

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 77

Of the service requests submitted via the EDI interface, 9% of FM errors were received within 1 hour⁸.

EDI FM Response Timeliness				
< 1 hr	1-2 hrs	2-4 hrs	4-12 hrs	TOTAL
4	27	10	3	44
9%	61%	23%	7%	100%

The following table provides detail on the late Resale FM errors received.

PON	VER	CC	LSR SENT	CLR RECEIVED	1-2 hrs	2-4 hrs	4-12 hrs	BellSouth Response
R019A11PEN100001	00	9991	03/10/00 02:08 PM	03/10/00 03:30 PM	X			Rec 3/10 1:18 Clar 3/10 1:41
R025A11PEN100001	00	9992	03/10/00 02:22 PM	03/10/00 03:43 PM	X			
R027H12PEN100001	00	9991	04/28/00 01:20 PM	04/28/00 02:46 PM	X			
R018B21PEN000003	00	9990	03/15/00 10:41 AM	03/15/00 12:01 PM	X			
R018B21PEN000001	00	9990	03/15/00 10:38 AM	03/15/00 12:01 PM	X			
R019A11PEN100003	00	9991	03/10/00 02:10 PM	03/10/00 03:30 PM	X			Rec 3/10 1:18 Clar 3/10 1:36
R028A11PEN100013	00	9991	03/10/00 03:03 PM	03/10/00 04:43 PM	X			Rec 3/10 2:20 Clar 3/10 3:06
R028A11PEN100015	00	9991	03/10/00 03:05 PM	03/10/00 04:43 PM	X			Rec 3/10 8:16 Clar 3/10 9:00
R028A11PEN100016	00	9991	03/10/00 03:05 PM	03/10/00 04:43 PM	X			Rec 3/10 2:30 Clar 3/10 3:06
R028A11PEN100017	00	9991	03/10/00 03:06 PM	03/10/00 04:43 PM	X			Rec 3/10 2:30 Clar 3/10 3:06
R028A11PEN100018	00	9991	03/10/00 03:07 PM	03/10/00 04:43 PM	X			Rec 3/10 2:30 Clar 3/10 3:06
R042A12PEN000008	00	9990	04/18/00 10:24 AM	04/18/00 11:43 AM	X			Rec 4/18 9:35 Clar 4/18 10:01
R028A11PEN100014	00	9991	03/10/00 03:04 PM	03/10/00 04:43 PM	X			Rec 3/10 2:30 Clar 3/10 3:06
R011H21PEN100006	02	9991	05/09/00 05:27 PM	05/09/00 06:30 PM	X			Rec 5/9 4:23 Clar 5/9 5:02
R002A21PEN100002	00	9992	03/15/00 10:07 AM	03/15/00 12:01 PM	X			Rec 3/15 9:39 Clar 3/15 10:06
R011H21PEN100006	00	9991	05/02/00 03:36 PM	05/02/00 04:41 PM	X			
R005A22PEN100002	00	9993	03/17/00 02:26 PM	03/17/00 03:38 PM	X			Rec 3/17 1:47 Clar 3/17 2:00
R005A22PEN100002	01	9993	03/24/00 01:51 PM	03/24/00 03:25 PM	X			
R005G22PEN100002	00	9990	02/22/00 01:31 PM	02/22/00 02:59 PM	X			

⁸ The Georgia Public Service Commission (GPSC) standard for purposes of this evaluation, adopted on June 6, 2000, is 95% of FM errors within 1 hour.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 77

PON	VER	CC	LSR SENT	CLR RECEIVED	1-2 hrs	2-4 hrs	4-12 hrs	BellSouth Response
R005G22PEN101002	00	9990	03/01/00 09:25 AM	03/01/00 10:36 AM	X			
R010A11PEN100002	00	9992	03/15/00 10:22 AM	03/15/00 12:01 PM	X			
R011C22PEN100003	00	9992	03/15/00 08:33 AM	03/15/00 09:43 AM	X			
R005G22PEN101002	02	9990	03/02/00 10:11 AM	03/02/00 11:11 AM	X			
R011C22PEN100005	00	9992	03/15/00 08:34 AM	03/15/00 09:43 AM	X			
R011C22PEN100006	00	9992	03/15/00 08:35 AM	03/15/00 09:43 AM	X			
R011C22PEN100007	00	9992	03/15/00 08:36 AM	03/15/00 09:43 AM	X			
R011C22PEN100003	01	9992	03/15/00 01:48 PM	03/15/00 03:42 PM	X			
R010A11PEN100002	01	9992	03/15/00 02:51 PM	03/15/00 05:08 PM		X		Rec 3/15 2:44 Clar 3/15 3:06
R002A21PEN100002	01	9992	03/15/00 03:56 PM	03/15/00 07:40 PM		X		Rec 3/15 3:30 Clar 3/15 4:06
R042A12PEN000004	00	9990	04/04/00 01:20 PM	04/04/00 04:41 PM		X		Rec 4/04 1:31 Clar 4/04 2:09
R028D11PEN000003	00	9990	03/15/00 02:35 PM	03/15/00 05:08 PM		X		Rec 3/15 2:44 Clar 3/15 3:07
R013A22PEN100001	00	9991	02/24/00 04:06 PM	02/24/00 06:33 PM		X		Rec 2/24 3:20 Clar 2/24 4:42
R028D11PEN000001	00	9990	03/15/00 02:33 PM	03/15/00 05:08 PM		X		Rec 3/15 2:44 Clar 3/15 3:06
R011C22PEN100006	01	9992	03/15/00 05:11 PM	03/15/00 07:40 PM		X		Rec 3/15 4:13 Clar 3/15 4:35
R047A11PEN000004	00	9992	03/30/00 11:09 AM	03/30/00 02:53 PM		X		Unable to Locate
R028D11PEN000002	00	9990	03/15/00 02:34 PM	03/15/00 05:08 PM		X		Rec 3/15 2:44 Clar 3/15 3:06
R047A11PEN000016	00	9990	03/30/00 11:08 AM	03/30/00 02:53 PM		X		Rec 3/30 10:53 Clar 3/30 12:04
R005G22PEN100002	01	9990	02/23/00 01:02 PM	02/23/00 08:38 PM			X	Rec 2/23 12:19 Clar 2/23 2:06
R028A11PEN100011	00	9991	02/18/00 01:31 PM	02/18/00 09:56 PM			X	Rec 2/18 5:18 Clar 2/18 8:12
R005F12PEN100001	00	9992	02/18/00 04:00 PM	02/18/00 09:56 PM			X	Rec 2/18 5:18 Clar 2/18 8:12

Impact

The absence of timely CLRs will impact CLECs in the following way:

- Decrease in Customer Satisfaction.** The receipt of a timely CLR is a critical factor in a CLEC's ability to process an end-user's service request. Delays in the return of a CLR will slow the CLEC's ordering process and delay delivery of the ordered service

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 77

to the end-user. If a CLEC is unable to deliver ordered service to an end-user in a timely fashion, the CLEC's customer satisfaction will decrease.

BellSouth Response

BellSouth's responses, as measured by LEO timestamps, to the individual occurrences have been incorporated into the above tables.

TAG UNE

BellSouth disagrees with KPMG's results for TAG fully mechanized response timeliness. The individual responses can be seen in the table. Using the timestamps obtained by BellSouth from LEO, the TAG FM response timeliness is 100% < 1 hr.

EDI UNE

BellSouth completed a random sample review of the EDI UNE PONs in the EDI table. BellSouth disagrees with 5 of the 5 PONs sampled in the 1-2 hr category and 2 of the 2 PONs sampled in the 2-4 hr category. Extrapolating these results, EDI FM response timeliness for UNE PONs is 100% < 1 hr.

EDI Resale

BellSouth randomly reviewed 12 of the 27 EDI PONs in the 1-2 hr category and disagree with KPMG's findings on all 12 PONs. BellSouth also disagrees with 7 of the 10 incidents in the 2-4 hr category. The response timeliness based on this research leads to a result of 86% of the FM CLR responses < 1 hr. BellSouth will migrate to a Mercator EDI solution on 12/15/00 to improve EDI timeliness results.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 113



December 5, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning Service Quality Measurements (SQMs).

Initial Exception:

BellSouth-reported raw data values for Commitment Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Service Order numbers and Purchase Order numbers for six Provisioning metrics.

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.¹

As part of the BellSouth-Georgia OSS Evaluation, KCL compared the data that BellSouth uses to produce SQM reports for the KCL test CLEC with the corresponding data that KCL collects using its own test management tools. For each of the Provisioning metrics – *Mean Held Order Interval and Distribution Intervals, Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices, Percent Missed Installation Appointments, Average Completion Interval / Order Completion Interval Distribution, Average Completion Notice Interval, and Total Service Order Cycle Time* – KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date)² that KCL received from Hewlett Packard for March, April, and May 2000.

KCL could not match the BellSouth-reported values in these fields with the corresponding KCL-collected values for certain service order numbers and purchase order numbers. Table 1 shows the specific discrepancies for Commitment Date.

¹ These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

² Commitment Date is the due date indicated in the FOC that is received by HP and provided to KCL.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 113

TABLE 1—COMMITMENT DATE

PON	SO_NBR	MONTH	BLS-REPORTED VALUE	KCL-REPORTED ³ VALUE
R010A11PTN100001	CO0VJ7L2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PEN100003	CO24RH11	March	3/21/00 12:00 AM	03/24/00 12:00 AM
R002A11PEN100003	CO270WV2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R002A11PTN101002	COBV58F5	March	3/23/00 12:00 AM	03/27/00 12:00 AM
R002A11PEN100005	CP0X8M92	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PTN100004	CP4CF625	March	3/21/00 12:00 AM	03/23/00 12:00 AM
R002A11PEN100001	CP5QH432	March	3/21/00 12:00 AM	03/28/00 12:00 AM
R002A11PTN100004	CP86GNN9	March	3/23/00 12:00 AM	03/28/00 12:00 AM
424A314PTJ000001	NO26B2P9	March	2/16/00 12:00 AM	03/01/00 12:00 AM
422A114PEJ101001	NOBJDYR1	March	2/18/00 12:00 AM	03/03/00 12:00 AM
615A122PTH102014	CP7R0531	April	4/27/00 12:00 AM	04/25/00 12:00 AM
R047A11PTN000018	NO4Y4Y46	April	4/27/00 12:00 AM	04/18/00 12:00 AM
378A315PEI001001	NP0FNX10	April	3/29/00 12:00 AM	03/23/00 12:00 AM
R041A21PTN100006	NP9V5K27	April	4/12/00 12:00 AM	04/17/00 12:00 AM
R041A21PEN100007	NPF01H46	April	4/12/00 12:00 AM	04/21/00 12:00 AM
R041B21PEN100001	NPF1MLT2	April	4/11/00 12:00 AM	04/17/00 12:00 AM
311F212PEH102002	CO2MXTV7	May	5/11/00 12:00 AM	05/10/00 12:00 AM
R036A22PTN000003	COVQ5886	May	5/1/00 12:00 AM	04/27/00 12:00 AM
R041A12PEN100009	NO0VF3L7	May	5/17/00 12:00 AM	05/18/00 12:00 AM
301A212PEH101016	NO2WDK96	May	5/5/00 12:00 AM	04/14/00 12:00 AM
301A212PTH102014	NO831LW8	May	12/29/00 12:00 AM	04/18/00 12:00 AM
398A213PEM000003	NP02RM89	May	5/2/00 12:00 AM	04/28/00 12:00 AM
378A315PEI001001	NP0FNX10	May	12/29/00 12:00 AM	03/23/00 12:00 AM
R041A12PEN100012	NP8HRNF6	May	5/12/00 12:00 AM	05/19/00 12:00 AM
305A122PTH105001	NP9MJXD8	May	5/8/00 12:00 AM	04/25/00 12:00 AM

Amended Exception:

Revised BellSouth-reported raw data values for Commitment Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for three Provisioning metrics.

KCL received revised raw data from BellSouth. KCL compared these revised raw data to the KCL-collected data.

KCL could not match the revised BellSouth-reported values with the corresponding KCL-collected values for certain purchase order numbers and service order numbers.

³ These values are contained in response files provided to KCL by HP.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 113

Table 2 shows the specific discrepancies for Commitment Date.

TABLE 2—COMMITMENT DATE

PON	SO_NBR	RAW DATA FILE	BLS REPORTED VALUE	KCL REPORTED VALUE	MONTH
303A222PEH101001	CO6TFTB9	JPDY	3/3/00	2/29/00	March
428A124PTJ100012	NO4HLD96	JPDY	12/30/00	2/21/00	March
406C213PTM100002	NO9HBW68	JPDY	12/30/00	1/21/00	March
428A224PTJ100009	NOBC0M48	JPDY	12/29/00	2/22/00	March
422A114PEJ101001	NOBFJ3F3	JPDY	3/3/00	2/18/00	March
302A312PEH000003	NOBQ1C99	JPDY	3/2/00	2/29/00	March
403A223PTM100003	NP32R9P9	JPDY	12/30/00	2/15/00	March
607A214PEJ102001	NP74MLL1	HO	2/16/00	12/30/00	March
422A114PEJ101001	NOBJDYR1	PMI	2/18/00	3/3/00	March
424A314PTJ000001	NO26B2P9	PMI	2/16/00	3/1/00	March
R002A11PEN100001	CP5QH432	PMI	3/21/00	3/28/00	March
R002A11PEN100003	CO270WV2	PMI	3/21/00	3/27/00	March
R002A11PEN100005	CP0X8M92	PMI	3/21/00	3/27/00	March
R002A11PTN100004	CP86GNN9	PMI	3/23/00	3/28/00	March
R002A11PTN101002	COBV58F5	PMI	3/23/00	3/27/00	March
R010A11PEN100003	CO24RH11	PMI	3/21/00	3/24/00	March
R010A11PTN100001	CO0VJ7L2	PMI	3/21/00	3/27/00	March
R010A11PTN100004	CP4CF625	PMI	3/21/00	3/23/00	March
R041A21PEN100007	NPF01H46	PMI	4/12/00	4/21/00	April
R041A21PTN100006	NP9V5K27	PMI	4/12/00	4/17/00	April
R041B21PEN100001	NPF1MLT2	PMI	4/11/00	4/17/00	April
378A315PEI001001	NP0FNX10	PMI	3/29/00	3/23/00	April
R041A12PEN100012	NP8HRNF6	PMI	5/12/00	5/19/00	May

BellSouth Response

BellSouth and KPMG have had several conference calls to investigate the discrepancy between BellSouth reported raw data values for Commitment Date for KCL Test CLEC and KCL collected values. When KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date) that KCL received from Hewlett Packard for March, April, and May 2000, KCL could not match the BellSouth-reported values in these fields with the corresponding KCL-collected values for certain service order numbers and purchase order numbers.

On September 29th, it was determined that the Test CLEC data KCL downloaded from the PMAP website for the months of March, April, and May, may not have been accurate as the reports had been rerun since that time.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 113

On September 29th, KPMG issued a data request for the following new updated raw data files for the KPMG Test CLEC for March, April, and May:

- (a) Average Completion Notice Interval
- (b) Held Orders
- (c) Jeopardy Notice Interval
- (d) Order Completion Interval Distribution for Trunks & Non-Trunks
- (e) Percent missed Installation Appointments for Trunks & Non-Trunks
- (f) Total Service Order Cycle Time
- (g) Troubles within 30 days of Provisioning Trunks & Non-Trunks

BellSouth sent the updated raw data to KPMG on 10/02/00 for the Data Comparison Test for ordering & Provisioning SQMs.

On November 7th, KPMG sent to BellSouth a list of PONs from the various Provisioning raw data files - Mean Held Order Interval and Distribution Intervals (HO), Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices (JPDY), Percent Missed Installation Appointments (PMI), Average Completion Interval / Order Completion Interval Distribution (OCI), Average Completion Notice Interval (ACNI), and Total Service Order Cycle Time (TSOCT)- from March-Sept 2000, where KPMG could not match the service order numbers.

In KPMG's second amended Exception 113, KPMG reported that BellSouth values for the Commitment Date (CMTT_DATE) do not match KPMG Consulting LLC (KCL) Test CLEC values for certain Purchase Order numbers and service order numbers for Provisioning Metrics for PMI, Jeopardy, and Held Order.

PMI

PMI requires that the first CMTT_DATE (original due date) on the service order be used for the PMI calculation. PMI business rules dictate only records with an original due date (SO_CMTT_TYPE_CD = 1) should be included.

Jeopardy

The Jeopardy record, SO_NBR = NO9HBW68 was cancelled and therefore does possess a CMPLT_DT and will not contain the accurate CMTT_DATE.

The three Jeopardy records (SO_NBR in 'NO4HLD96', 'NOBC0M48', 'NP32R9P9') have CMTT_DATE reported in February, thus not affecting the March calculation of the Jeopardy measure.

The remaining three records can be explained using the logic that if the latest CMTT_DATE is within the reporting month, exclude the rest of the records in the group. The three Jeopardy service orders addressed by KCL, are capturing a CMTT_DATE

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 113

prior to the latest CMTT_DATE and from a previous month. This CMTT_DATE should be dropped and replaced with the latest CMTT_DATE in the current month.

Held Order

For this held order record (SO_NBR = NP74MLL1) the number reported by BLS for the CMTT_DATE was 2/16/00, and the value reported by KCL was 12/30/00. According to the commitment history, the original date was 2/16/00 and then it was scheduled later to 12/30/00. This could be due to a variety of reasons, but most likely, the order was held off until further notice, so the date was scheduled far in the future.

Held Order Processing Methodology states that the last due date that carries a company missed appointment code and does not have a subsequent due date should be captured. The held interval is measured as the reporting period end date back to the first company missed date on the service order.

The date that should be captured is the original date. Therefore the date of 2/16/00 is the correct date.

BELLSOUTH'S RESPONSE TO EXCEPTION 116



November 1, 2000

EXCEPTION REPORT

An exception has been identified as a result of the TAG Pre-Order Functional Evaluation (PRE-1).

Exception:

Version 2.2.0.11 of BellSouth's TAG pre-order interface does not provide a Calculated Due Date (CDD) for UNE Loop-Port Combination service requests.

BellSouth's CDD pre-order query provides CLECs with the standard service provisioning interval for subsequent orders, based on the order requisition type (e.g., UNE Loop, UNE Port), activity type (e.g., disconnection, migration), quantity of lines, and product category identifier.

KPMG Consulting LLC (KCL) attempted to process a CDD for a UNE Loop-Port Combination request via TAG Version 2.2.0.11. Following the procedure outlined in the *Pre-Order Business Rules*, KCL populated the UNE Product Identifier field with a value of "0", representing a "NOTUNETOCALCULATE" entry¹. Since UNE Loop-Port Combinations do not fall under Resale service, KCL entered "NOTRSTOCALCULATE" in the Resale Product Identifier field².

KCL received the following error message via the TAG interface: "ILEC Exception, Invalid Data Exception – Invalid Data element: RSPROD, Error Code: TAG8008VAL, Msg Text: RSPROD REQUIRED."

The current Business Rules do not adequately explain the requirements for processing UNE Loop-Port Combination CDDs.

Impact

The inaccurate or incomplete Business Rule requirements for issuing CDDs on Loop-Port Combinations prohibit CLECs from processing electronic pre-orders for due date selection. This will impact a CLEC's pre-order and ordering process flow, and result in additional time to research pre-order errors.

¹ According to Version 7 of the *Pre-Order Business Rules* (p. 258), Loop Port Combinations utilize a UNEPROD indicator of "0".

² The Pre-Order Business Rules do not currently address requirements for the RSPROD field. See Observation XX for additional information.

BELLSOUTH'S RESPONSE TO EXCEPTION 116

BellSouth Response

Calculate Due Date for PreOrder (Version 2.2.0.11) has two fields:

- RSPROD (Resale product category)
- UNEPROD (UNE product category)

Both have a list of valid values, however, Loop/Port Combo was inadvertently omitted from the UNEPROD product category. Therefore, when submitting a CDD Pre-Order transaction and when entering a "0" (zero) in both fields you will receive the following error:

"ILEC Exception, Invalid Data Exception - Invalid Data element: RSPROD, Error Code: TAG8008VAL, Msg Text: RSPROD REQUIRED."

On an interim basis, when submitting a calculated due date transaction for REQTYPE M Loop/Port Combo you must populate the RSPROD field with 31 or 32. This is an interim solution that will be communicated to all TAG users via the Change Control Process that may be experiencing the same problem.

BellSouth will submit a Change Request as a feature against the requirements to process REQTYPE M as a UNE Loop/Port Combo. This feature will be submitted via the Change Control Process and scheduled for a future release.

BELLSOUTH'S RESPONSE TO EXCEPTION 117



November 1, 2000

EXCEPTION REPORT

An exception has been identified as a result of the xDSL Functional Evaluation (PO&P12).

Exception:

BellSouth did not provide a Clarification/Rejection response to a Loop Make-Up (LMU) Service Inquiry within the specified seven-day interval.

According to the *BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1)*¹ from the Interconnect website, a CLEC should receive a Clarification/Rejection response to an LMU/SI within seven working days. KPMG Consulting LLC (KCL) submitted 16² LMU Service Inquiry forms with the following PONs and received the Clarification/Rejection response after the seven day interval:

PON	Date LMU/SI Sent to BellSouth	Date LMU/SI Received by BellSouth and Forwarded to SAC BellSouth Response	Date CLR/Reject Received by KPMG	Date LMU/SI Received from SAC & Forwarded to LCSC BellSouth Response
X0R01A	8/8/00	8/8/00	9/1/00	8/11/00*
X0R02A	8/9/00	8/9/00	9/1/00	8/22/00
X0R04A	8/8/00	8/9/00	9/7/00	8/23/00
X0R05A	8/8/00	8/9/00	9/1/00	8/23/00
X0R08A	8/8/00	8/9/00	9/7/00	8/23/00
X0R10A	8/8/00	8/9/00	9/7/00	8/11/00*
X0R12A	8/8/00	8/28/00	9/9/00	9/8/00
X0R34A	8/30/00	8/31/00	9/14/00	9/13/00
X0R35A	8/23/00	8/24/00	9/13/00	9/12/00
X0R36A	8/23/00	8/24/00	9/13/00	9/12/00
X0R39A	8/23/00	8/28/00	9/7/00	9/7/00*
X0R40A	8/23/00	8/24/00	9/13/00	9/12/00
X0R43A	8/23/00	8/24/00	9/14/00	9/13/00
X0R44A	8/23/00	8/24/00	9/14/00	9/13/00
X0R48A	8/23/00	8/24/00	9/13/00	9/12/00
X0R52A	8/29/00	8/29/00	9/19/00	9/18/00

¹ BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1):

<http://www.interconnection.bellsouth.com/products/UNE/bstlmnu.pdf>

² During functional testing, 152 LMU-SI/Local Service Requests were submitted to the BellSouth Complex Resale Support Group.

BELLSOUTH'S RESPONSE TO EXCEPTION 117

Impact

The absence of a Clarification/Rejection response to an LMU Service Inquiry will delay the ordering of xDSL services. This will negatively impact customer satisfaction with the CLEC. The CLEC will also incur additional cost and time related to researching the status of the LMU.

BellSouth Response

BellSouth agrees with KPMG's findings with the exception of the three PONs listed below:

XOR01A was received in the LCSC on 08/11 and was rejected on 08/11. It was received again on 08/31 and clarified on 9/1, which was within the 7 day interval.

XOR10A was received in the LCSC on 09/07 and was clarified on 09/07. In checking with the CRSG I found that this PON was first sent on 08/11 but they did not show it had ever been LONd, so it was resent on 09/07. There is no indication that the LCSC ever received it on 08/11.

XOR39A was received in the LCSC on 09/07 and was clarified on 09/07, which is an 8 day interval. I don't know if this was one that was received in the CRSG after 3:00pm which would be considered the next day and would account for the late clarification.

BELLSOUTH'S RESPONSE TO EXCEPTION 118



December 8, 2000

EXCEPTION REPORT

An exception has been identified as a result of the TAG and EDI Order Functional Re-test (O&P-1 and O&P-2).

Exception:

BellSouth failed to deliver Completion Notices (CNs) for several KPMG Consulting LLC (KCL) Local Service Requests (LSRs).

For the following 8 LSRs, BellSouth did not deliver CNs. KCL investigated these orders within BellSouth's web-based CLEC Service Order Tracking System (CSOTS). According to the CSOTS status reports, 5 of these LSRs are in CA (Cancelled) status. KCL did not issue orders to cancel the LSRs.

The following table provides details on the service orders currently affected by this issue.

PON*VER	Company Code (CC)	Req/Act	FOC DD	CSOTS Status ¹	BellSouth Response
398R213PTM000001*00	9994	FV	9/5/00	CA	Agree. Service rep canceled service orders in error. Unable to determine reason for cancellation
303R222PEF001001*00	9991	JA	9/21/00	CA	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group

¹ CP Status = Order is Complete. CA Status = Order is Cancelled. PD Status = Order is Pending Due Date.

BELLSOUTH'S RESPONSE TO EXCEPTION 118

PON*VER	Company Code (CC)	Req/Act	FOC DD	CSOTS Status ¹	BellSouth Response
305R222PEH001001*00	9994	AV	9/25/00	CA	Agree. Service rep error should have clarified LSR. KPMG sent 2 PONs with same Misc Account number. KPMG sent 1 PON as a friendly CLEC requesting LNP and this PON as KPMG. Service order hit downstream error due to duplicate Misc Account number. Rep canceled the orders without sending a clarification
326R222PEH000002*00	9991	AV	9/22/00	PD	Agree. Service rep error. Service order updates exceeded the maximum number allowed in SOCS and was deleted. Unable to determine reason for maximum updates.
305R112PTF101003*02	9994	JA	9/22/00	CA	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group
317R122PTH000001*01	9991	AM	9/29/00	CP	Agree. Service rep error LSR should have been clarified for incorrect CC. Service order hit down stream error. Service rep corrected CC on the service order which prevented generation of CN.

BELLSOUTH'S RESPONSE TO EXCEPTION 118

PON*VER	Company Code (CC)	Req/Act	FOC DD	CSOTS Status ¹	BellSouth Response
326R222PTH001001*00	9994	AV	9/25/00	CA	Agree. Service rep error should have clarified LSR. KPMG sent 2 PONs with same Misc Account number. KPMG sent 1 PON as a friendly CLEC requesting LNP and this PON as KPMG. Service order hit downstream error due to duplicate Misc Account number. Rep canceled the orders without sending a clarification
625R214PTJ000006*00	9990	MC	9/25/00	PD	Disagree. CN on 10/30/00 when all down stream errors were cleared.
301R112PTF100004*00	9994	J A	10/6/00	CP	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group

BELLSOUTH'S RESPONSE TO EXCEPTION 118

PON*VER	Company Code (CC)	Req/Act	FOC DD	CSOTS Status	BellSouth Response
301R112PTF100004*00	9994	J/A	10/6/00	CP	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group
302R312PEF000006*00	9994	J/A	10/30/00	CP	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group
302R312PTF100004*00	9991	J/A	10/30/00	CP	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group

BELLSOUTH'S RESPONSE TO EXCEPTION 118

PON*VER	Company Code (CC)	Req/Act	FOC DD	CSOTS Status	BellSouth Response
305R112PTF100009*00	9994	J/A	9/29/00	CP	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group
305R112PTH000008*02	9994	A/V	10/16/00	PD	Unable to locate service order.
307R122PTF000006*01	9991	J/A	9/28/00	Not found	Unable to locate PON.
307R222PEH000001*02	9994	A/V	10/04/00	Not found	Unable to locate service order.
317R122PEH000004*01	9994	A/M	10/9/00	Not found	Unable to locate service order.
318R112PEH000001*00	9994	A/M	10/4/00	Not found	Disagree, CLR sent 08/29 at 14:03
319R122PEF000015*03	9990	J/A	10/30/00	CA	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group

BELLSOUTH'S RESPONSE TO EXCEPTION 118

PON*VER	Company Code (CC)	Req/Act	FOC DD	CSOTS Status	BellSouth Response
320R212PEF102005*00	9991	J/A	10/16/00	CP	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group
320R212PTF100008*01	9994	J/A	10/31/00	CP	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group
440R124PTJ000002*00	9990	M/SS	9/9/00	CP	Disagree, CN sent 09/09 at 16:41 and 22 additional times. Apparent KPMG TAG listener problem.
444R214PTJ100001*00	9990	M/D	9/5/00	PD	Unable to locate service order.

BELLSOUTH'S RESPONSE TO EXCEPTION 118

PON*VER	Company Code (CC)	Req/Act	FOC DD	CSOTS Status	BellSouth Response
452R216PEF000003*00	9990	J/R	10/10/00	CP	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group
454R126PEF000003*00	9990	J/R	10/10/00	CP	Unable to locate service order.
456R216PEF000002*00	9990	J/R	10/5/00	CP	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group
456R216PTF000001*00	9990	J/R	10/5/00	CP	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group

BELLSOUTH'S RESPONSE TO EXCEPTION 118

PON*VER	Company Code (CC)	Req/Act	FOC DD	CSOTS Status	BellSouth Response
456R216PTF000003*00	9990	J/R	10/10/00	CP	Agree. Service rep error should have clarified LSR for incorrect LIST field entry when service order hit down stream errors. Service order appeared on an internal error report and was incorrectly identified as an internal BellSouth test order. The service order was subsequently canceled by the error resolution group
615R122PTH100005*01	9994	A/A	10/25/00	PD	Unable to locate service order.
801R222PEI000003*00	7727 ²	B/W	10/12/00	Not found	Disagree, CN sent 11/16 at 16:02
801R222PTI001001*00	7727 ²	B/W	9/28/00	Not found	Agree, Service Rep error, CN not sent. PON typed incorrectly on service orders.

Impact

BellSouth's failure to notify a CLEC of completed orders creates confusion regarding order status. Missing CNs can create additional costs for CLECs because of the time required to research the status of a customer's order. In cases where the actual service completion has not occurred, CLECs' end users would be affected by a lack of timely service.

² Per the friendly CLEC participating in the LNP test, all TNs associated with this order have been ported.

BELLSOUTH'S RESPONSE TO EXCEPTION 118

BellSouth Response

KPMG submitted 13 PONs listed in the above tables with incorrect entries in the LIST (listed name code) field. The PONs flowed through with mechanized service order generation and FOCs were returned to KPMG. The service orders hit down stream errors and appeared on an internal error report. Manual clarification is normally sent to a CLEC when the service order hits down stream errors, a FOC has already been sent and a CLEC clarification is needed. In addition, a change request will be submitted to the change review board to mechanically clarify PONs with an incorrect LIST field entry prior to service order generation.

KPMG additionally submitted 2 PONs listed in the above tables with incorrect Misc. Account numbers. KPMG requested the same Misc. Account numbers for orders submitted as KPMG and as a "friendly CLEC". The PONs flowed through with mechanized service order generation and FOCs were returned to KPMG. The service orders hit down stream errors and were mistakenly cancelled. The service orders were subsequently canceled. Manual clarification is normally sent to a CLEC when the service order hits down stream errors, a FOC has already been sent and a CLEC clarification is needed.

BellSouth summary of findings for the 30 PONs included in this draft exception:

- Disagree, 4 PONs
- Unable to locate the service orders, 6 PONs
- Unable to locate 1 PON
- Service Rep error, 4 PONs
- KPMG ordering errors created initial problem, 15 PONs

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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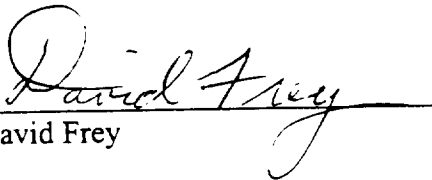
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January 5, 2001

Ms. Helen O'Leary
Executive Secretary
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RECEIVED

JAN 05 2001
EXECUTIVE SECRETARY
G.P.S.C.

RE: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems: Docket No. 8354-U

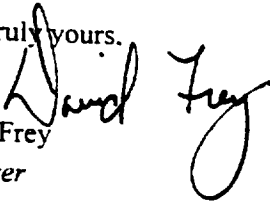
Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting LLC's Closure Reports for Exceptions 23, 57, 61, 66, 70, 74, 83, 84, 87, 97, 110, and 111.

We request that these documents be filed in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,


David Frey
Manager

Enclosures

cc: Parties of Record



KPMG Consulting, LLC KPMG Consulting, LLC is a subsidiary of
KPMG LLP, the U.S. member firm of KPMG International, a Swiss association



Date: January 5, 2001

EXCEPTION CLOSURE REPORT

Exception:

KPMG Consulting LLC (KCL) cannot replicate five of BellSouth's reported Service Quality Measurements.

Summary of Exception:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's operational support system performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes various performance measurement reports for each SQM, and the raw data used to create these reports, for every CLEC engaged in business activity with BellSouth in the state of Georgia¹.

As part of the BellSouth-Georgia OSS Evaluation, KCL is attempting to replicate these reports (i.e., achieve exactly the results recorded by BellSouth). To complete replication, KCL has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, (which includes instructions to calculate SQM values for certain reports), the corresponding raw data² and technical assistance³ from BellSouth.

KCL has been unable to replicate the following five SQMs:

1. *Average Answer Time - Repair Centers* for October 1999 for the CLEC Aggregate.⁴
2. *Speed of Answer in Ordering Center* for October 1999 and December 1999 for the CLEC Aggregate and BellSouth Retail. (The affected service center components are the BellSouth Residence Service Center, October 1999, and the Local Carrier Service Center, December 1999.)⁴

¹ These reports and raw data may be delivered in hard copy or via a secured Internet site, the Performance Measurement and Analysis Platform (PMAP).

² BellSouth publishes the *PMAP Raw Data User Manual* and corresponding raw data in order to provide the CLEC community the ability to calculate SQM values independently and thus verify their reports. The Manual is posted, and regularly updated, on the PMAP Internet site.

³ "Technical Assistance" includes any computation instruction KCL may have received in the replication of CLEC aggregate and/or manually generated metrics.

⁴ BellSouth provided KCL with the raw data and technical instruction necessary to validate the calculations for this SQM report, since the information is not otherwise available via PMAP.

CLOSURE REPORT FOR EXCEPTION 23

BellSouth Georgia OSS Testing Evaluation

-
3. *Mean Held Order Interval and Distribution Intervals* for December 1999 for the KCL CLEC.⁵
 4. *Percent Provisioning Troubles within 30 Days of Service Order Activity* for November 1999 for an individual CLEC. (The affected reports are *Percent Provisioning Troubles within 30 Days CLEC* and the *Percent Provisioning Troubles within 30 Days POTS CLEC*.)⁵
 5. *Firm Order Confirmation Timeliness* for December 1999 for the KCL CLEC. (The affected reports are *FOC Timeliness Fully Mechanized CLEC*, *FOC Timeliness Non-Mechanized CLEC*, *FOC Timeliness Partially Mechanized CLEC*, and *FOC Timeliness Total Mechanized CLEC*.)⁵

Summary of BellSouth's Response:

1. Average Answer Time - Repair Centers for October 1999 for the CLEC Aggregate

Business - KPMG has been able to replicate Average Answer Time – Repair Centers (Business) for October 1999 through clarification from BellSouth regarding which Business customers to use in replication.

Residence – KPMG has been able to replicate Average Answer Time – Repair Centers (Residence) for October 1999 using BellSouth's instructions.

BRMC – KPMG has been able to replicate Average Answer Time – Repair Centers (BRMC/UNE) after receiving additional data and clarification from BellSouth.

UNE – KPMG has been able to replicate Average Answer Time – Repair Centers (BRMC/UNE) after receiving additional data and clarification from BellSouth.

2. Speed of Answer in Ordering Center for October 1999 and December 1999 for the CLEC Aggregate and BellSouth Retail.

BellSouth Residence Service Center – KPMG has been able to replicate Speed of Answer in Ordering Center (Residence Service Center) for the month of October 1999 after receiving additional data for Service and Collection Centers and further clarification from BellSouth.

Local Carrier Service Center – KPMG has been able to replicate Speed of Answer in Ordering Center (LCSC) for December 1999.

⁵ KCL used the latest available *PMAP Raw Data User Manual (Version 2, 12/15/99)* to validate the calculations for this SQM report.

CLOSURE REPORT FOR EXCEPTION 23

BellSouth Georgia OSS Testing Evaluation

3. Mean Held Order Interval and Distribution Intervals for December 1999 for the KPMG CLEC

KPMG has been able to replicate Mean Held Order Interval and Distribution Intervals for December 1999 using the instructions in the Raw Data Manual issued in February.

4. Percent Provisioning Troubles within 30 Days of Service Order Activity for November 1999 for an individual CLEC.

The raw data for Provisioning Troubles in 30 days for months prior to March 2000 will not add back to the reports because of an error in the program, which assigned troubles called in by a CLEC customer who had changed providers during the month. The program assigned the trouble to the lowest numbered cust-id. This resulted in a small number of mismatched troubles. At the aggregate level the small error was not evident. KPMG without the help of the appropriate BellSouth SMEs would have difficulty replicating the reports for those months. Replicating the report would require the identification of those troubles in the report but not in the raw data and appropriately assigning these troubles to the correct CLEC. The software code for Percent Provisioning within 30 days has been corrected and future months (March 2000 forward) will not have this problem. BellSouth asks that reports for March 2000 forward be used for validation.

5. Firm Order Confirmation Timeliness for December 1999 for the KPMG CLEC.

The product "Combos" is included in UNE Other. BellSouth is currently in the process of disaggregating Combos (Loop + Port) into a separate product category."

Summary of KCL Re-Test Activities (by Issue Number):

1. Average Answer Time – Repair Centers for October 1999 for the CLEC Aggregate

Business – KCL received clarification that, prior to November 1999, only the small business customers were to be included in the calculation. KCL recalculated the SQM values based upon this instruction, and compared its recalculated values to the BellSouth-reported value. In subsequent months, BellSouth adjusted this metric to include all business customers.

Residence – KCL was able to match BellSouth's reported values during its initial comparison, therefore no re-testing was required.



BRMC – BellSouth re-generated its SQM value, and posted this revised (November 1999) report. KCL compared this revised value to the value that KCL calculated. Additionally, KCL received June 2000 data, and calculated the SQM value for June based upon these data. KCL then compared its calculated value to the BellSouth-reported value for June.

UNE – KCL received from BellSouth additional data and instructions on how BellSouth calculates the UNE value. KCL recalculated its value using these new data and instructions, and compared it to the BellSouth-reported value.

2. Speed of Answer in Ordering Center for October 1999 and December 1999 for the CLEC Aggregate and BellSouth Retail

BellSouth Residence Service Center – KCL received additional data from BellSouth, and proceeded to recalculate the SQM values. KCL then compared these recalculated values with the BellSouth-reported values.

Local Carrier Service Center – KCL received additional data from BellSouth, and proceeded to recalculate the SQM values. KCL then compared these recalculated values with the BellSouth-reported values.

3. Mean Held Order Interval and Distribution Intervals for December 1999 for the KCL CLEC

Based upon BellSouth's response, KCL revised its computer programs to incorporate the instructions found in the February version of the Raw Data User Manual. KCL then compared the recalculated values with the BellSouth-reported values.

4. Percent Provisioning Troubles within 30 Days of Service Order Activity for November 1999 for an individual CLEC.

Based upon BellSouth's responses, KCL reviewed all of the reports beginning with March 2000, and compared the BellSouth-reported values with the KCL-calculated values.

5. Firm Order Confirmation Timeliness for December 1999 for the KCL CLEC.

Based upon BellSouth's responses, KCL revised its computer programs to map the "Combos" products to the "Other" category. KCL then compared its calculations using these new instructions to the BellSouth report originally provided. KCL has used these new instructions consistently for all months since the December report, for calculation verification purposes. (KCL reviews the KCL Test CLEC reports for every month as a part of its regular testing activities.)



CLOSURE REPORT FOR EXCEPTION 23

BellSouth Georgia OSS Testing Evaluation

KCL Re-Test Results (by Issue Number):

1. *Average Answer Time – Repair Centers for October 1999 for the CLEC Aggregate.*

Business – The KCL-recalculated value exactly matched the BLS-reported value.

Residence – KCL was able to match BellSouth's reported values during its initial comparison, therefore no re-testing was required.

BRMC – The revised BellSouth-reported value for November 1999 matched the KCL-calculated value. Additionally, the KCL-calculated value for June 2000 matched the BellSouth-reported value.

UNE – The KCL-recalculated value exactly matched the BellSouth-reported value.

2. *Speed of Answer in Ordering Center for October 1999 and December 1999 for the CLEC Aggregate and BellSouth Retail*

BellSouth Residence Service Center – The value KCL calculated when using the new data and instructions exactly matched the BellSouth-reported value.

Local Carrier Service Center – The value KCL calculated when using the new data and instructions exactly matched the BellSouth-reported value.

3. *Mean Held Order Interval and Distribution Intervals for December 1999 for the KCL CLEC*

When KCL implemented the instructions found in the February version of the *Raw Data User Manual*, the resulting calculated values matched the BellSouth-reported values. Further, the values KCL calculated for this SQM subsequent to those posted in the December report match those reported by BellSouth.

4. *Percent Provisioning Troubles within 30 Days of Service Order Activity for November 1999 for an individual CLEC.*

KCL's calculations matched the BellSouth-reported values for all months beginning with March 2000.

5. *Firm Order Confirmation Timeliness for December 1999 for the KCL CLEC.*

When KCL followed BellSouth's revised instructions indicating that the "Combos" product should be mapped to the "OTHER" category, all of the KCL-calculated values matched the BellSouth-reported values.

**CLOSURE REPORT FOR EXCEPTION 23**BellSouth Georgia OSS Testing Evaluation

As a result of clarifications made by BellSouth to KCL personnel, review and use of documentation updated by BellSouth, and changes in metric calculations by BellSouth as appropriate depending on the issue in question, KCL believes that BellSouth has adequately addressed the issues identified in Exception 23. However, KCL did issue an Observation to BellSouth noting that BellSouth's internal quality assurance processes had not detected any of the problems or errors identified in this exception and Exception 70 until KCL brought them to BellSouth's attention. BellSouth responded that it was developing a formal Performance Measurements Quality Assurance Plan to address the issues identified in the Observation document.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 23.

Attachments: None.

Date: January 5, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth guidelines for submitting xDSL pre-order Service Inquiry (SIs) for Loop Make-Up (LMU) information do not exist.

In requesting xDSL service for an end-user, CLECs often perform a pre-order service inquiry (SI) for loop make-up (LMU) information. CLECs employ the information returned on this SI to determine the type of xDSL service that can be delivered to the particular end-user given the current make-up of the end-user's loop.

As part of xDSL testing, KPMG Consulting LLC (KCL) will submit pre-order SIs for LMU information. In preparing to perform these testing activities, KCL discovered that pre-order business rules, procedure(s) for submission of LMU forms (fax and/or e-mail), and expected results returned to the CLEC through the LMU process do not exist.

BellSouth Response

BellSouth does have guidelines for submitting xDSL Loop Makeup Service Inquiries. These guidelines can be found on the BellSouth Interconnection Services web site. The actual web address and instructions are as follows:

GO TO: www.interconnection.bellsouth.com

CLICK ON: Local Exchange Carriers

CLICK ON: CLEC Products

CLICK ON: Product List

CLICK ON: Unbundled Network Elements

CLICK ON: BellSouth Unbundled ADSL/HDSL Capable Loops

CLICK ON: BellSouth Loop Modifications

There are a number of documents found on the web, but those that may satisfy KPMG's request are entitled BellSouth Unbundled ADSL/HDSL Capable Loops and BellSouth Loop Modification.



Additional Response

BellSouth is currently modifying the xDSL pre-ordering SI process to include both electronic and manual ordering business rules and procedures. These new business rules and procedures will be posted to the Interconnection Website by 7/1/00.

Summary of KCL's Re-test Activities:

KCL's retest activities consisted of an evaluation of BellSouth's *Loop Makeup CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup* to determine if guidelines for submitting and receiving LMU Service Inquiries and responses are readily available to CLECs. This document can be found at http://www.interconnection.bellsouth.com/guides/bpob.pdf/lmupo_og.pdf.

KCL Re-test Results:

The document provides a detailed description of the pre-ordering process including the LMU-SI process, the submission process for the service request (including acceptable format) and the Manual LMU-SI instructions outlining how to populate and format the fields. Additionally, responses to LMU-SIs are outlined with acceptable response codes and detailed descriptions. Additional information regarding the LMU process can also be found in the BellSouth Loop Makeup (LMU) CLEC Information Package located on the BellSouth website at <http://www.interconnection.bellsouth.com/products/UNE/bstlmup.pdf>.

Based on its review of BellSouth's *Loop Make-Up CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup* documentation as posted on the BellSouth website, KCL concludes that BellSouth provides adequate guidelines for submitting xDSL pre-order Service Inquiry for Loop Make-Up.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 57.

Attachments: None.

**CLOSURE REPORT FOR EXCEPTION 61**

BellSouth Georgia OSS Testing Evaluation

Date: January 5, 2001

EXCEPTION CLOSURE REPORT**Exception:**

For certain Service Quality Measurements ("SQMs"), BellSouth does not report values at all levels of disaggregation specified in the *Service Quality Measurements Georgia Performance Report 10/22/99 (SQM Reports)*.

Summary of Exception:

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.¹

As part of the BellSouth-Georgia OSS Evaluation, KPMG Consulting LLC (KCL) is reviewing the accuracy and completeness of BellSouth's reported SQMs. In the course of this review, KCL is evaluating whether BellSouth reports SQM values at the levels of disaggregation specified in the *SQM Reports*.

KCL discovered that in one or more months during the period October 1999 to December 1999, BellSouth did not report SQMs at the appropriate levels of disaggregation.

The following table details the missing levels of disaggregation for the specified SQMs during this period.²

Missing Levels of Disaggregation in Reported SQM Values

Service Domain	SQM Name	Missing Levels of Disaggregation
Ordering	Percent Rejected Service Requests	Trunks
Ordering	Reject Interval	Interconnection Trunks Resale Design UNE Design UNE Non-Design UNE Loop without NP

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

² BellSouth reported all SQMs at the appropriate levels of disaggregation, as specified in the *SQM Reports*, excepted as noted in the table.



CLOSURE REPORT FOR EXCEPTION 61

BellSouth Georgia OSS Testing Evaluation

Service Domain	SQM Name	Missing Levels of Disaggregation
Ordering	Firm Order Confirmation Timeliness	Interconnection Trunks Resale Design UNE Design UNE Non-Design UNE Loop without NP
Provisioning	Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notice	Local Interconnection Trunks
Provisioning	Average Completion Notice Interval	Interconnection Trunks
Provisioning	Total Service Order Cycle Time	Interconnection Trunks
Maintenance & Repair	Missed Repair Appointments	PBX CENTREX and ISDN UNE 2 Wire Loop (Design and Non-Design) UNE Loop Other (Design and Non-Design) UNE Other (Design and Non-Design)
Maintenance & Repair	Customer Trouble Report Rate	PBX CENTREX and ISDN UNE 2 Wire Loop (Design and Non-Design) UNE Loop Other (Design and Non-Design) UNE Other (Design and Non-Design)
Maintenance & Repair	Maintenance Average Duration	PBX CENTREX and ISDN UNE 2 Wire Loop (Design and Non-Design) UNE Loop Other (Design and Non-Design) UNE Other (Design and Non-Design)
Maintenance & Repair	Percent Repeat Troubles within 30 Days	PBX CENTREX and ISDN UNE 2 Wire Loop (Design and Non-Design) UNE Loop Other (Design and Non-Design) UNE Other (Design and Non-Design)
Maintenance & Repair	Out of Service > 24 Hours	PBX CENTREX and ISDN UNE 2 Wire Loop (Design and Non-Design) UNE Loop Other (Design and Non-Design) UNE Other (Design and Non-Design)

Summary of BellSouth Response:

The SQM that KCL received was the first attempt by BellSouth to produce a regional SQM document. The regional SQM reflected the measurements and disaggregations for all states. Each individual state report reflected only those levels of disaggregation ordered by that state's PSC. The regional SQM was updated on 5/15/00 to more clearly show the disaggregation levels for each state. BellSouth has furnished KCL the October SQM that was Georgia specific reflecting the disaggregation ordered by the GA PSC.

BellSouth added an introduction on 5/19/00 to the SQM that explains that it is a regional document and that the state specific measures and disaggregations are noted in each section. These measures and disaggregations were based on GA and LA State orders for Performance Measurements and associated product disaggregations. BellSouth posted the introduction on the PMAP website at the end of May 2000.



KCL will continue to attempt to replicate the test CLEC SQM reports for all months in which the KCL test CLEC generated transactions. KCL will replicate one month of the CLEC aggregate/ BellSouth Retail reports, typically October 1999. If KCL needs to re-test based upon an Exception, they will pick additional months of SQM reports to replicate, as appropriate.

To address the question of which levels of disaggregation BellSouth should have been reporting since October, for both the test CLEC and CLEC aggregate / BellSouth Retail reports, KCL will use the SQM manuals BellSouth has been publishing, focusing on the May 15 SQM manual. Originally, the KCL comparison of the reports with the October 22, 1999 SQM Manual resulted in Exception 61.

BellSouth will not re-create any reports (in particular, the December 1999, January 2000, or February 2000 CLEC aggregate reports) according to the June 6 documented levels of disaggregation, nor is KCL expanding replication activities to cover additional reports, except as noted above.

For statistical comparison, BellSouth will instruct KCL on how to take the data they already have, and assign them to the levels of disaggregation in the June 6 document. This applies to both the test CLEC data, as well as the Retail data. KCL will meet with BellSouth programmers and other personnel as appropriate to discuss this mapping of data. The instructions, however, on this assignment of data to the June 6 categories will be created by BellSouth.

Summary of KCL Re-Test Activities:

KCL noted BellSouth's response above – in particular its statement that the SQM manual KCL used that led to Exception 61 was a regional (BellSouth-wide) SQM manual, and not meant to reflect reporting for BellSouth Georgia operations per se. The May 2000 manual, on the other hand, more clearly delineates which requirements apply to Georgia, and more recent manuals have been created specifically to apply to Georgia reporting. That is, there is now a completely distinct document applicable to Georgia versus the rest of the BellSouth region.

Upon receiving the September 2000 SQM manual, KCL reviewed the levels of disaggregation for all SQMs for which KCL is validating and verifying calculations. KCL compared the levels of disaggregation BellSouth indicated it was reporting (per the September 2000 SQM manual) to the SQM reports to determine whether all levels of disaggregation that BellSouth indicated it was reporting were actually being reported. Based upon this review, KCL also reviewed SQM manuals published through November 2000 for those SQMs for which the SQM manual and SQM reported levels of disaggregation still differed.



KCL Re-Test Results:

With several exceptions among the Provisioning SQMs, KCL confirmed that all of the levels of disaggregation that BellSouth indicated in the September 2000 SQM manual were actually listed as categories in the SQM reports, and were being reported upon. The remaining discrepancies were resolved via updates included in the November 2000 SQM manual.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 61.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 61.

Attachments: None.

Date: January 5, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth does not provide complete pre-order responses via the Telecommunications Access Gateway (TAG) interface.

Summary of Exception:

In response to a valid pre-order query, BellSouth generates a response containing the information requested (e.g., telephone numbers, customer address, feature availability) based on the query type submitted.

The BellSouth *Pre-order Business Rules*¹ provide information on the data that will be returned within the pre-order responses. This documentation provides a listing of data elements, or fields, that should be present on the response. It also contains information on valid field data values, based on the specific pre-order query type and the format characteristics (e.g., 9 alpha characters) of those data values.

Based on a detailed review of a sample of pre-order responses received from the TAG interface, KPMG Consulting LLC (KCL) noted deficiencies in response completeness. These deficiencies can be divided into two categories:

1. Missing Data Elements

The pre-order response does not contain fields listed in the BellSouth documentation.

2. Extraneous Data Elements

The pre-order response contains fields that are not listed in the BellSouth documentation.

The following table presents the response completeness deficiencies identified by KCL. Results are broken down by response type.

¹ To evaluate results associated with this initial Exception, KCL utilized *BellSouth Preorder Business Rules Version 4.0*.

CLOSURE REPORT FOR EXCEPTION 66

BellSouth Georgia OSS Testing Evaluation

TAG Preorder Responses

Deficiency Type	Data Elements
Missing	<p><i>Address Validation Response – Street Name</i></p> <ul style="list-style-type: none"> - HOUSE-NUM-HI - HOUSE-NUM-LOW - ODD-EVEN-IND - AHN STATUS <p><i>Address Validation Response - Menu of Address Response</i></p> <ul style="list-style-type: none"> -EST-SERVICE-DATE -TEXT-CODE -TEXT
Extraneous	<p><i>Address Validation Response – Single Address Match</i></p> <ul style="list-style-type: none"> - ADDR-STATUS - FACAVAIL - TN - QUICK-SERV-IND

CLOSURE REPORT FOR EXCEPTION 66

BellSouth Georgia OSS Testing Evaluation

Summary of BellSouth's Response:

Deficiency Type	Data Elements	BellSouth Response
Missing	<p>TAG Release 2.2-1 Requirements, Issue 4, 1/20/00 (BD-TAG-REQ-R2.2-1)</p> <p>Address Validation Response – Street Name Response (AVR-F)</p> <ul style="list-style-type: none"> – (Required) - TAG-DSA-HOUSE-NUM-HI – (Required) - TAG-DSA-HOUSE-NUM-LOW – (Required) - TAG-DSA-ODD-EVEN-IND – (Required) - TAG-DSA-AHN-STATUS <p>Address Validation Response - Menu of Address Response</p> <p>-EST-SERVICE-DATE -TEXT-CODE -TEXT</p>	<p>TAG API Reference Guide BD-TAG-API-R2.2.0.7-1 Issue 16, February 29, 2000 RELEASE 2.2.0.7</p> <p>Equivalent fields</p> <p>FROMHOUSENUMBER TOHOUSENUMBER</p> <p>ODDEVENINDICATOR</p> <p>ASSIGNEDHOUSENUMBERSTATUS</p> <p>Equivalent fields</p> <p>ESTSERVICEDATE TEXTCODE TEXT</p>
Extraneous	<p>TAG Release 2.2-1 Requirements, Issue 4, 1/20/00 (BD-TAG-REQ-R2.2-1)</p> <p>Address Validation Response – Single Address Match Response (AVR-AB)</p> <ul style="list-style-type: none"> – (Optional) – TAG-DTN-ADDR-STATUS – (Optional) – TAG-DTN-FACAVAIL – (Optional) – TAG-DTN-TN (Optional) – TAG-DTN-QUICK-SERV-IND 	<p>Equivalent fields</p> <p>ADDRESSSTATUS</p> <p>AVAILABLEFACILITIESINDICATOR TELEPHONENUMBER QUICKSERVEINDICATOR</p>

Additional BellSouth Response

“After testing with the input data provided, the response received from TAG 2.2.0.7c contained the fields that were stated as missing from the Address Validation Response-

CLOSURE REPORT FOR EXCEPTION 66

BellSouth Georgia OSS Testing Evaluation

Street Name. As a result of these findings there is no reproducible fault with the data provided. The code is working as designed.

2. Address Validation Response – Menu of Addresses

The TAG 2.2 system requirements do not have a response same “Address Validation Response-Menu of Addresses”. The response field referenced in the KPMG exception is found in the Single Address Match Response. The fields are represented in the API Guide with the equivalent names shown in the table above. These fields are optional and are documented in the BellSouth Pre-Order Business Rules and the TAG 2.2 System Requirements.

3. The Address Validation Response – Single Address Match (AVR-AB)-

The TAG 2.2 System Requirements consider these 3 fields as optional; therefore, their presence in a Single Address Match (AVR-AB) is not a fault. These fields are represented in the API Guide with the equivalent names shown in the table above. The data is not extraneous and the code is working as designed. The data elements of the field is also documented in the BellSouth Pre-Order Business Rules.”

Summary of KCL Re-test Activities:

KCL performed a re-test of pre-order response accuracy by conducting the following two activities:

1. BellSouth indicated that internal testing found no missing fields on the Address Validation Response – Street Name. KCL re-submitted several AVQs to review data elements on the response.
2. KCL conducted a review of BellSouth responses to the range of pre-order query types submitted during the Pre-Order Functional Evaluation against the requirements set forth in the BellSouth *Pre-Order Business Rules, Version 7.0*.

KCL Re-test Results:

Based on re-test activities, KCL noted the following results:

1. The fields on the Address Validation Response – Street Name that were previously identified as “Missing” were present on KCL’s subsequent AVQ transactions.

CLOSURE REPORT FOR EXCEPTION 66

BellSouth Georgia OSS Testing Evaluation

2. All fields required by the BellSouth *Pre-Order Business Rules Version 7.0* were found to be populated on the pre-order responses². In addition, KCL did not find any cases of extraneous data elements (i.e., elements not identified in the Business Rules) appearing on pre-order responses.

KCL believes the response completeness issues initially identified in this Exception resulted from a misinterpretation of the relationship between response fields identified within the *TAG API Reference Guide* and those documented in the *Pre-Order Business Rules*. Perceived discrepancies between the API Guide and Business Rules were addressed and resolved within Exception 63 (see Exception 63 for additional information on this issue). KCL initiated Exception 66 re-test activities following resolution of documentation discrepancies, and used the *Business Rules* as the sole source for expected response data.

Based on these re-test activities, KCL verified that pre-order responses contained complete information relative to the requirements documented in BellSouth's *Pre-Order Business Rules*.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 66.

Attachments: None.

² During initial re-test activities, KCL noted that one field within the Calculate Due Date (CDD) responses was missing – INQNUM. BellSouth later amended its *Pre-Order Business Rules Version 8.0*, to address this problem. The INQNUM field within CDD responses is no longer a required data element.

CLOSURE REPORT FOR EXCEPTION 70

BellSouth Georgia OSS Testing Evaluation

Date: January 5, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth does not have an adequate change management process for the generation of Service Quality Measurement (SQM) data from its legacy/source systems.

Summary of Exception:

Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

The raw data BellSouth uses to calculate SQMs are extracted from various BellSouth legacy/source systems. As a result of the following observations, KPMG Consulting LLC (KCL) believes that BellSouth does not adequately monitor the impact of changes to legacy/source systems on the procedures for collection of raw data.²

1. On one occasion, a data format change caused data to be entered incorrectly into PMAP. This problem occurred because changes in the legacy/source systems were not communicated to the PMAP personnel who produce the SQM reports. The PMAP personnel identified the error during the production run and made the necessary corrections.
2. Trunk Group Performance reports were not posted from October 1999 to December 1999. This problem occurred after changes to the source system that provides raw data caused insufficient data to be produced for these SQMs. These changes were not communicated to PMAP personnel.
3. Partial data and incomplete reports were inadvertently posted for several months for the pre-ordering SQM *Average Response Time and Response Interval*. This problem occurred because BellSouth changed the source system components that provided the raw data used in this SQM's calculation. The new components lacked the ability to feed data for this SQM into PMAP. The change and its implications were not communicated to PMAP personnel.

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

² KCL's observations are drawn from interviews with BellSouth personnel regarding the SQM report generation process.

CLOSURE REPORT FOR EXCEPTION 70

BellSouth Georgia OSS Testing Evaluation

BellSouth has a validation process that compares record counts processed by the legacy/source systems and PMAP and reviews the reports produced. While this validation process may identify some legacy/source system changes, it does not constitute an adequate change management process, as evidenced by the problems cited above.

Summary of BellSouth's Response³:

"On one occasion, a data format change caused data to be entered incorrectly into PMAP

BellSouth does have a process in place where legacy system support groups notify the Performance Measurement Analysis group of pending upgrades or system changes. There was one occasion where the notification failed and a data format change resulted in incorrect data. The PMAP Subject Matter Expert found the error during the data validation process and made the necessary corrections. This validation process is a normal component of the process to publish the SQMs. This process was followed and the published SQMs were accurate.

On 9/6/00, BellSouth sent to KCL copies of internal correspondence and directives outlining a Change Control Plan requirement to keep the Performance Measurement Group informed of legacy systems changes. Specifically, these changes include any that would impact the production and accuracy of the monthly PMAP reports.

Through the internal correspondence, the Systems Teams have been notified of this requirement and have incorporated this as part of their systems notification process.

Trunk Group Performance reports were not posted from October 1999 to December 1999.

In the fall of 1999, the system providing trunk group data for the Network Information Warehouse (NIW) was taken out of service due to Y2K issues. Just prior to the system being taken out of service, the group responsible for the system that produces the Trunk Group Performance Reports experienced a vendor relationship issue. The vendor relationship issue resulted in a delayed implementation of the new Trunk Group Performance Reports data source. The vendor issue was resolved, and the reports became available in March 2000.

The PMAP personnel were aware as the issue was communicated to all parties involved in this data source. When the data became available, the reports were published.

Partial data and incomplete reports were inadvertently posted for several months for the pre-ordering SQM Average Response Time and Response Interval

³ "Summary of BellSouth's Response" is replicated from *BellSouth's Second Amended Response to Exception 70*.

CLOSURE REPORT FOR EXCEPTION 70

BellSouth Georgia OSS Testing Evaluation

This exception refers to the loss of the data from the RNS servers in late 1999, which were taken out of service because the servers were not Y2K compliant. The replacement servers had not been programmed to capture the required data. Once the PMAP SME identified the problem, action was taken to get the Legacy system owners to perform an upgrade to again produce the data required for the PMAP reports. Since this incident, the legacy system owners have been proactive in keeping the PMAP Team informed of system impacting changes. The 'data feeds' for RNS and ROS began in February and the change request is being worked to pull this information into PMAP.

The *Average Response Time and Response Interval Reports* were not inadvertently posted with incomplete data. The BellSouth Service Quality Measurements group had discovered that the RNS and ROS data was missing. The 'data feeds' for these measures have been reestablished and the BellSouth data was in the May report posted in June.

As a result, BellSouth changes to legacy systems and data sources are handled appropriately and communicated via e-mail to the PMAP SME. The RNS data is now in the reports as well as the ROS data. The BellSouth Issues Management and Change Control Plan has been updated, and all members of the team retrained on their responsibilities to prevent this type of problem. The legacy system owners are aware of the Performance Measurement Group and its requirements for support."

Summary of KCL Re-Test Activities:

For each of the elements listed in the exception, KCL re-test activities consisted of:

1. A review of BellSouth's specific responses to these elements
2. A review of the updated *Issues Management and Change Control Plan*.
3. A review of the e-mails and memos that make up the aforementioned "internal correspondence and directives."

KCL Re-Test Results (by Issue):

1. *On one occasion, a data format change caused data to be entered incorrectly into PMAP.*

As BellSouth noted in its response, the normal notification process failed in this instance of a system upgrade/change. The result was an error in the data provided to the PMAP SME, who then identified the error during the data validation process.

KCL determined that BellSouth has made updates to its formal metrics change control process as described in the updated *Issues Management and Change Control Plan*. Further, the memos and e-mails sent by senior BellSouth management to the relevant parties indicate that BellSouth has taken significant steps to implement its new policies.

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Primarily, these new policies make legacy/source system owners responsible for informing members of the PMAP team when system changes occur. Further, both types of data owners will bring their expertise to bear when changes are being discussed and implemented.

As a result, KCL believes that BellSouth personnel should be better able to anticipate the types of data formatting problems that occurred, and thus address them at an earlier stage in the production process in the future.

2. Trunk Group Performance reports were not posted from October 1999 to December 1999.

BellSouth noted in its response above that PMAP personnel were aware of the delayed implementation of the new Trunk Group Performance Reports data source. When the data became available in March 2000, the reports were once again published.

KCL believes that as a result of BellSouth's new requirements of broader notification of legacy systems changes, communication between legacy system owners and PMAP personnel will be enhanced. This enhanced communication and notification process should strengthen BellSouth's ability to properly identify and avoid potential negative impacts of future changes or problems with source system data.

3. Partial data and incomplete reports were inadvertently posted for several months for the pre-ordering SQM "Average Response Time and Response Interval."

BellSouth noted in its response above that the RNS servers were taken out of service in late 1999, because they were not Y2K compliant. KCL believes that most problems related to this specific type of problem have already been identified.

Additionally, KCL believes that the legacy system owners should have notified the PMAP SME of the problem, rather than having the PMAP SME identify the problem. However, legacy system owners took appropriate action to perform the relevant upgrade, as noted above.

As noted for the other issues presented above, the BellSouth *Issues Management and Change Control Plan* has been updated, and members of the team retrained. The legacy system owners are aware of the Performance Measurement Group and its requirements for support. Additionally, the communication/notification process has been enhanced. However, KCL did issue an Observation to BellSouth noting that BellSouth's internal quality assurance processes had not detected any of the problems or errors identified in this exception and Exception 23 until KCL brought them to BellSouth's attention. BellSouth responded that it was developing a formal Performance Measurements Quality Assurance Plan to address the issues identified in the Observation document.



CLOSURE REPORT FOR EXCEPTION 70

BellSouth Georgia OSS Testing Evaluation

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 70.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 70.

Attachments: None.

**CLOSURE REPORT FOR EXCEPTION 74**BellSouth Georgia OSS Testing Evaluation

Date: January 5, 2001

EXCEPTION CLOSURE REPORT**Exception:**

BellSouth does not report certain Georgia Service Quality Measurements ("SQMs") at the levels of disaggregation specified in the *Service Quality Measurements Georgia Performance Reports*.

Summary of Exception:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.¹

As part of the BellSouth-Georgia OSS Evaluation, KPMG Consulting LLC (KCL) is reviewing the adequacy and completeness of the process for reporting SQMs, as specified in the *SQM Georgia Performance Reports*.² KCL is evaluating whether BellSouth reports performance measurement details at the levels of disaggregation specified in the *SQM Georgia Performance Reports*.

KCL discovered that BellSouth does not report SQMs at the levels of disaggregation specified in the *SQM Georgia Performance Reports* for the SQMs in the table below.

Table 1: SQMs Reported by BellSouth with Missing Levels of Disaggregation

Service Domain	SQM Name	Levels of Disaggregation Missing from SQM Reports
Ordering	Reject Interval	Design, UNE Non-Design, UNE Loop without NP
Ordering	Firm Order Confirmation Timeliness	Design, UNE Non-Design, UNE Loop without NP
Provisioning	Service Order Accuracy	Dispatch/No Dispatch
Billing	Mean Time to Deliver Invoices	Interconnection
Maintenance & Repair	Missed Repair Appointments	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) web site.

² KCL used BellSouth's *SQM Georgia Performance Reports, Version 10/22/99* as the basis for performing this test.

**CLOSURE REPORT FOR EXCEPTION 74**

BellSouth Georgia OSS Testing Evaluation

Service Domain	SQM Name	Levels of Disaggregation Missing from SQM Reports
Maintenance & Repair	Customer Trouble Report Rate	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other
Maintenance & Repair	Maintenance Average Duration	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other
Maintenance & Repair	Percent Repeat Troubles within 30 Days	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other
Maintenance & Repair	Out of Service > 24 Hours	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other

Summary of BellSouth Response:

“The SQM that KCL received was the first attempt by BellSouth to produce a regional SQM document. The regional SQM reflected the measurements and disaggregations for all states. Each individual state report reflected only those levels of disaggregation ordered by that state’s PSC. The regional SQM was updated on 5/15/00 to more clearly show the disaggregation levels for each state. BellSouth has furnished KCL the October SQM that was Georgia specific reflecting the disaggregation ordered by the GA PSC.

BellSouth added an introduction on 5/19/00 to the SQM that explains that it is a regional document and that the state specific measures and disaggregations are noted in each section. These measures and disaggregations were based on GA and LA State orders for Performance Measurements and associated product disaggregations. BellSouth posted the introduction on the PMAP website at the end of May 2000.

KCL will continue to attempt to replicate the test CLEC SQM reports for all months in which the KCL test CLEC generated transactions. KCL will replicate one month of the CLEC aggregate/ BellSouth Retail reports typically October 1999. If KCL needs to re-test based upon an Exception, they will pick additional months of SQM reports to replicate, as appropriate.

To address the question of which levels of disaggregation BellSouth should have been reporting since October, for both the test CLEC and CLEC aggregate / BellSouth Retail reports, KCL will use the SQM manuals BellSouth has been publishing, focusing on the May 15 SQM manual. Originally, the KCL comparison of the reports with the October 22, 1999 SQM Manual resulted in Exception 74.

Except as noted above, BellSouth will not re-create any reports (in particular, the December 1999, January 2000, or February 2000 CLEC aggregate reports) according to

CLOSURE REPORT FOR EXCEPTION 74

BellSouth Georgia OSS Testing Evaluation

the June 6 documented levels of disaggregation, nor is KCL expanding replication activities to cover additional reports.

For statistical comparison, BellSouth will instruct KCL on how to take the data they already have, and assign them to the levels of disaggregation in the June 6 document. This applies to both the test CLEC data, as well as the Retail data. KCL will meet with BellSouth programmers and other personnel as appropriate to discuss this mapping of data.

Since those results are usually zero, KCL will not see the level of disaggregation reported in the *Average Jeopardy Notice Interval* for Jeopardy Notices for interconnection trunks. These trunks seldom experience facility delays. This statement will be added to the next version of the SQM, with the change noted in the version change log."

Summary of KCL Re-Test Activities:

KCL noted BellSouth's response above – in particular its statement that the SQM manual KCL used that led to Exception 74 was a regional (BellSouth-wide) SQM manual, and not meant to reflect reporting for BellSouth Georgia operations per se. The May 2000 manual, on the other hand, more clearly delineates which requirements apply to Georgia, and more recent manuals were created specifically to apply to Georgia reporting. That is, there is now a completely distinct document applicable to Georgia versus the rest of the BellSouth region.

Upon receiving the May 2000 SQM manual, KCL reviewed the levels of disaggregation for all SQMs for which KCL is validating and verifying calculations. KCL compared the levels of disaggregation BellSouth indicated it was reporting (per the May 2000 SQM manual), to the SQM reports, to determine whether all levels of disaggregation that BellSouth indicated it was reporting were actually being reported.

KCL Re-Test Results:

KCL confirmed that all of the levels of disaggregation that BellSouth indicated in the May 2000 SQM manual were actually listed as categories in the SQM reports, and were being reported upon, if appropriate. Note that because the KCL test CLEC did not issue trunk orders, and did not issue every type of transaction for every month, it is not appropriate to expect there to be values for all categories in the test CLEC's SQM reports, for every month.

As a result of the review activities, KCL believes that BellSouth has adequately

CLOSURE REPORT FOR EXCEPTION 74

BellSouth Georgia OSS Testing Evaluation

addressed the issues identified in Exception 74.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 74.

Attachments: None.



Date: January 5, 2001

EXCEPTION CLOSURE REPORT

Exception:

Exclusions listed in the "Exclusions" section of the *Service Quality Measurements Georgia Performance Reports (SQM Reports)* are not correctly applied when creating raw data or calculating SQMs.

Summary of Exception:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.¹

As part of the BellSouth-Georgia OSS Evaluation, KPMG Consulting LLC (KCL) is reviewing the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.² KCL is evaluating the application of data exclusions listed in the SQM documentation for each metric.

KCL identified the following discrepancies regarding BellSouth's application of data exclusions (listed in the SQM reports) in raw data generation and SQM calculation:

1. Billing – Invoice Accuracy

The *SQM Reports* states that adjustments not related to billing errors are to be excluded from the calculation of this SQM. The queries used by BellSouth for this SQM to produce the raw data from CLEC records include conditional statements that exclude late payment charges and mandated adjustments. The queries used by BellSouth for this SQM to produce the raw data from BellSouth records do not include any equivalent conditional statements. Therefore, late payment charges and mandated adjustments are not excluded, and there are no steps in the calculation instructions that would exclude such records during the calculation of the SQM.

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) web site.

² KPMG used the *Service Quality Measurements Georgia Performance Reports, Version 10/22/99* as a basis to perform this test. KPMG also took into consideration changes published in the 2/24/00 version.



2. Billing – *Mean Time to Deliver Invoices*

The *SQM Reports* states that any invoices rejected due to formatting or content errors are to be excluded from the calculation of this SQM. BellSouth does not include any steps to apply the exclusion in the calculation of the SQM or the creation of the raw data for calculating the SQM.

Summary of BellSouth Response:

“Billing – Invoice Accuracy

The exclusions of adjustments are made by the Legacy systems owners to the raw data before it is transmitted to the Performance Measurement Group. BellSouth attempts to exclude any non-billing adjustments from its calculation for Billing Invoice Accuracy. Because adjustment data is derived from several sources, there are multiple queries that must be performed. The queries that are used to produce the raw data for Invoice Accuracy for BellSouth Interconnection aggregate are being updated to include the same conditional statements that are used in the queries for Invoice Accuracy for CLEC Interconnection. The June 2000 billing raw data, will reflect the use of the new query logic for BellSouth Interconnection type adjustments.

Billing – Mean Time to Deliver Invoices

These exclusions are performed prior to processing by PMAP. These errors reflect transmission problems associated with the CLEC's equipment, or a customer's request that BellSouth retransmit data.

The SQM Document will be updated in the July 2000 version to amend the Exclusion to include “**invoices resent due to customer requests**”.”

Summary of KCL Re-Test Activities:

KCL re-test activities included:

1. *Billing – Invoice Accuracy*

KCL reviewed the changes to queries used to produce the June Billing Raw Data.

2. *Billing – Mean Time to Deliver Invoices*

KCL reviewed the changes BellSouth made to the July 2000 SQM.

KCL Re-Test Results:

Based upon its review, KCL developed the following conclusions for each issue.

1. *Billing – Invoice Accuracy*

KCL found the changes BellSouth made to the queries used to extract the June 2000 Raw Billing Data to be consistent with the documented calculation method and the stated intent of the Invoice Accuracy metric.

2. *Billing – Mean Time to Deliver Invoices*

KCL found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of the Mean Time to Deliver Invoices metric.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 83.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 83.

Attachments: None.



Date: January 5, 2001

EXCEPTION CLOSURE REPORT

Exception:

The information in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)* is inconsistent with the computational instructions provided by BellSouth¹ for five Service Quality Measurements (SQMs).

Summary of Exception:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports².

As part of the BellSouth-Georgia OSS Evaluation, KPMG Consulting LLC (KCL) reviewed BellSouth's implementation of the definitions of the SQMs, as documented in the *SQM Reports*.³ KCL compared the information in *SQM Reports* to the computational instructions in the *PMAP Raw Data User Manual* and the instructions provided by BellSouth for manual SQMs in order to assess their consistency.⁴

1. Provisioning – Total Service Order Cycle Time

Instructions provided by BellSouth to compute this SQM prescribe converting null values to 0.33 days for the *tsoct_dur* field. This is inconsistent with the *SQM Reports*, which specifies that these intervals be computed as the difference between two time stamps expressed as date and time. Therefore, no approximation should be needed if the SQMs are computed as described in the *SQM Reports*.

2. Provisioning – Order Completion Interval

¹ The "computational instructions provided by BellSouth" either appeared in the *PMAP Raw Data User Manual*, or were provided by BellSouth for manual SQMs.

² These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform ("PMAP") Web site.

³ KCL used the *SQM Reports, Version 10/22/99* as a basis to perform this test. KCL also considered changes published in *Version 2/24/00*.

⁴ KCL used instructions from the *PMAP Raw Data User Manual – Version 2.0.4 – December 15, 1999* and information provided by BellSouth.

**CLOSURE REPORT FOR EXCEPTION 84****BellSouth Georgia OSS Testing Evaluation**

Instructions provided by BellSouth to compute this SQM prescribe converting null values to 0.33 days for the `cmpld_dur` field. This is inconsistent with the *SQM Reports*, which specifies that these intervals be computed as the difference between two time stamps expressed as date and time. Therefore, no approximation should be needed if the SQMs are computed as described in the *SQM Reports*.

3. Collocation – *Average Arrangement Time*

The *SQM Reports, Version 10/22/99* specifies that this SQM is computed in business days. *Version 2/24/00* does not specify whether it should be computed in business days or calendar days. The computational instructions provided by BellSouth call for computing this SQM in calendar days.

4. Operator Services/Directory Assistance – *Average Speed to Answer*

The *SQM Reports* states that “Calls abandoned by customers are not reflected in the average speed to answer [...]” The instructions provided by BellSouth to compute this SQM indicate that the time that abandoned calls stay in the queue is included in the numerator.

5. Billing – *Mean Time to Deliver Usage*

The computational instructions provided by BellSouth prescribe that usage records falling within the “30+” category of delivery duration be given a weight of 31.5. However, 31.5 does not necessarily represent an estimation of delivery duration for records that take significantly more than 30 days to deliver. Depending upon the actual delivery time of these records, this procedure could underestimate the SQM.

Summary of BellSouth Response:

Provisioning – Total Service Order Cycle Time

The July update to the SQM will include an addition of the following:

Business Rules: “Orders that are worked on zero due dates are calculated with a .33 day interval (8 hours) in order to report a portion of a day interval. These orders are issued and worked/completed on same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched).”

The Calculation will be corrected to read: “ Σ (Completion Date of Service Order) - (Date of Service Request Receipt) / (Count of Orders Completed in Reporting Period)”

Provisioning – Order Completion Interval

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The July update to the SQM will include an addition of the following:

Business Rules: "Orders that are worked on zero due dates are calculated with a .33 day interval (8 hours) in order to report a portion of a day interval. These orders are issued and worked/completed on same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched)."

The Calculation will be corrected to:

" Σ (Completion Date) – (Order Issue Date) / Σ (Count of Orders Completed in Reporting Period)"

Collocation – Average Arrangement Time

At one time BellSouth's standard collocation contract specified provisioning intervals in business days. The standard contract was later changed to calendar days. There was a mixture of customer contracts (some with business days, others with calendar days) which should not be averaged together, so BellSouth defaulted SQM reporting to calendar days. The reference to business days was deleted from the 2/24/00 SQM version based on the contract change. BellSouth revised the Definition for the Average Arrangement Time measurement to clarify that the provisioning interval is measured in calendar days with the July, 2000 SQM update.

Operator Services/Directory Assistance – Average Speed to Answer

The Average Speed to Answer does consider the amount of time a call waits in queue, so BellSouth concurs that the referenced statement should be deleted from the SQM. The SQM has been revised, effective May 2000, and now shows "None" under Exclusions for the Average Speed to Answer measurement.

The second sentence of the Business Rules for Average Speed to Answer will be revised in the July 2000 SQM update to read as follows: "The length of each call is determined by measuring, using a scanning technique, and accumulating the elapsed time from the entry of a customer call into the BellSouth call management system queue until the customer call is abandoned or transferred to BellSouth personnel assigned to handle calls for assistance."

Billing – Mean Time to Deliver Usage

BellSouth compiled a seven-month study to determine the number of invoices in the 30+ Category. As the attached results indicate, 0.22% fell into the 30+ Category. The 0.22% does not justify the expense involved to track and measure this portion of the component.

BellSouth has added a note to the SQM Documentation indicating to the CLECs that any invoice that falls in the 30+ Category will be given a weight of 31.5 days in the results calculations.

**CLOSURE REPORT FOR EXCEPTION 84**

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MEAN TIME TO DELIVER USAGE RECORDS - ALLCLECs:

<u>MONTH</u>	<u>TOT.</u> <u>RECORDS</u>	<u>30+</u> <u>RECORDS</u>	<u>% 30+</u> <u>RECORDS</u>
Apr-00	23,393,595	25.360	0.1084%
Mar-00	25,880,349	19.165	0.0741%
Feb-00	21,554,135	22.270	0.1033%
Jan-00	19,598,574	32.478	0.1657%
Dec-99	19,221,788	72.724	0.3783%
Nov-99	18,323,210	106.678	0.5822%
Oct-99	18,357,512	46.172	0.2515%
TOTALS:	<u>146,329,163</u>	<u>324.847</u>	<u>0.2220%</u>

Additionally, as requested, BellSouth provided KCL with a list of usage records that had days delayed (30+) and the breakout of those usage records by the actual days delayed. These 100 messages were extracted through a lengthy, manual process. A work request would be required for the ODUF/ADUF reports to show message delay for all days. The BellSouth conclusion is that the 0.22% does not justify the expense involved to track and measure this portion of the component. A note has been posted to the PMAP Web Site indicating to the CLECs that any invoice that falls in the 30+ Category will be given a weight of 31.5 days in the results calculations.

Summary of KCL Re-Test Activities:

KCL re-test activities included:

1. Provisioning – *Total Service Order Cycle Time*

KCL reviewed the changes BellSouth made to the July 2000 SQM.

2. Provisioning – *Order Completion Interval*

KCL reviewed the changes BellSouth made to the July 2000 SQM.

3. Collocation – *Average Arrangement Time*

KCL reviewed the changes BellSouth made to the July 2000 SQM.

4. Operator Services/Directory Assistance – *Average Speed to Answer*

KCL reviewed the changes BellSouth made to the May 2000 and July 2000 SQMs.

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5. Billing – *Mean Time to Deliver Usage*

KCL reviewed the results of BellSouth's analysis and verified that, in the period addressed, only 0.22% of invoices fell within the 30+ Category. KCL also reviewed the changes BellSouth made to the July 2000 SQM.

KCL Re-Test Results:

1. Provisioning – Total Service Order Cycle Time

KCL found the changes BellSouth made to the July, 2000 SQM to be consistent with the documented calculation method and the definition as stated in the SQM for the Total Service Order Cycle Time metric.

2. Provisioning – *Order Completion Interval*

KCL found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of the Order Completion Interval metric.

3. Collocation – *Average Arrangement Time*

KCL found the changes BellSouth made to the July SQM to be consistent with the documented calculation method and the stated intent of the Average Arrangement Time metric.

4. Operator Services/Directory Assistance – *Average Speed to Answer*

KCL found the changes BellSouth made to the May 2000 and July 2000 SQMs to be consistent with the documented calculation method and the stated intent of the Average Speed to Answer metric.

5. Billing – *Mean Time to Deliver Usage*

KCL found that the number of invoices in this category was so small as to not materially affect the reported results and believes that the approximation used by BellSouth is justified. KCL also found the changes BellSouth made to the July SQM to be consistent with the documented calculation method.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 84.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 84.

Attachments: None.



Date: January 5, 2001

EXCEPTION CLOSURE REPORT

Exception:

Computation instructions provided by BellSouth for thirteen PMAP Service Quality Measurements (SQMs) are inconsistent with the information provided in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*¹.

Summary of Exception:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports².

As part of the BellSouth-Georgia OSS Evaluation, KPMG Consulting LLC (KCL) is comparing the instructions provided by BellSouth³ for computing SQMs to their definitions as documented in the *SQM Reports*⁴ in order to assess their consistency.

1. Ordering – Firm Order Confirmation Timeliness

For the *Firm Order Confirmation Timeliness* SQM, the second exclusion listed in the *SQM Reports*, "Partially Mechanized or Non-Mechanized LSRs received and/or FOC'd outside of normal business hours," is not addressed either in the computation instructions or in the raw data creation process.

When Local Service Requests (LSRs) are either confirmed or received outside of normal business hours, the date confirmed/received as recorded in the BellSouth systems is converted to a date falling within business hours. Therefore, such service requests are included when computing the *Firm Order Confirmation Timeliness* SQM, and the second

¹ Relevant PMAP SQM information is documented in the Definitions, Exclusions, Calculation and Business Rules sections of the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.

² These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform ("PMAP") Web site.

³ KCL used instructions from the *PMAP Raw Data User Manual – Version 2.0.4 – December 15, 1999* and information provided by BellSouth personnel.

⁴ KCL used the 10/22/99 version of the *SQM Reports* as a basis to perform this test. KCL also took into consideration changes published in the 2/24/00 version of the *SQM Reports*.

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exclusion listed in the *SQM Reports* is inconsistent with the computation instructions provided by BellSouth.

2. Ordering – *Percent Rejected Service Requests*

For the *Percent Rejected Service Requests* SQM, the exclusion listed in the *SQM Reports*, “Service Requests cancelled by the CLEC prior to being rejected/clarified,” is not addressed either in the computation instructions or in the raw data creation process.

Service requests cancelled by the CLEC prior to being rejected or clarified manually are automatically excluded from the numerator when calculating this SQM, since such service requests would not generate rejection records. However, KCL could not find instructions to exclude cancelled service requests from the denominator of the SQM (“service requests received during the reporting period”). Therefore, the exclusion listed in the *SQM Reports* is inconsistent with the computation instructions provided by BellSouth.

3. Ordering – *Reject Interval*

For the *Reject Interval* SQM, the computation instructions do not include fatal rejects when computing this SQM for the fully mechanized category. The *SQM Reports* specify that fatal rejects are included in the fully mechanized category⁵. Since fatal rejects are effectively instantaneous, the numerator (time interval) would be unchanged. However, the denominator (volume) would differ from its current calculation by the number of fatal rejects.

4. Provisioning – *Percent Provisioning Troubles within 30 days of Service Order Activity*

KCL identified two inconsistencies between the computation instructions and the *SQM Reports*:

- The instructions provided by BellSouth prescribe excluding trouble records for which `cause_id < 0`.⁶ Some of the records excluded through this operation are consistent with exclusions stated in the *SQM Reports* (“cancelled and non-customer generated troubles”). However, this also excludes troubles due to Customer Provided Equipment (“CPE”), which is not listed as an exclusion in the *SQM Reports*.
- The *SQM Reports* describe the denominator of this SQM as “all service orders completed in the report calendar month,” and does not list an exclusion for provisioning appointments on which the customer requested a later due date. The instructions for denominator computation provided by BellSouth prescribe excluding

⁵ *SQM Reports*, *Business Rules* section.

⁶ Step 2 of the *PMAP Raw Data User Manual – Troubles Within 30 Days of Provisioning (Non Trunks)*.



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records for which 'so_cmnt_cd = "L"' from the "Provisioning: Order Completion Interval" raw data file.⁷ Such records are associated with service orders that were not provisioned on the committed due date because the customer requested that the provisioning appointment be postponed (so_cmnt_desc_dd = "Customer request later due date"). Subsequently the instructions prescribe including records for which so_cmnt_type_cd = 1.⁸ This results in keeping only records with an original due date, thereby excluding all records with subsequent due dates. The effect of these stipulations is to exclude (among other records) all service order records relating to original provisioning appointments for which the customer requested a later due date.

5. Provisioning – Total Service Order Cycle Time

For the *Total Service Order Cycle Time* SQM, the fourth exclusion listed in the *SQM Reports* – "L Appointment coded orders" – is not addressed either in the computation instructions or in the raw data creation process.

6. Provisioning – Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices

For the *Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices* SQM, none of the exclusions listed in the *SQM Reports* are addressed in either the computation instructions or the raw data creation process.

7. Provisioning – Average Completion Notice Interval

For the *Average Completion Notice Interval* SQM, KCL identified two inconsistencies between the computation instructions and the *SQM Reports*:

- The instructions provided by BellSouth prescribe including records for which "tsocs_mthd_acqstn = 0, 1 or 2."⁹ This equates to excluding non-mechanized orders (tsocs_mthd_acqstn = 3, 4 or 5), which is consistent with exclusions listed in the *SQM Reports*; excluding mechanized orders acquired through TAG (tsocs_mthd_acqstn = 6); and excluding all partially mechanized orders (tsocs_mthd_acqstn = 7, 8 or 9) acquired through any interface. The *SQM Reports* does not list mechanized orders acquired through TAG and partially mechanized orders as exclusions for this SQM.
- This SQM is computed from the "Provisioning: Average Completion Notice Interval raw data file." BellSouth has described this file as providing "all service orders within a given reporting period." Both the computation instructions and the raw data creation process call for orders to be limited to those completed before the end of the

⁷ Step 7 of the *PMAP Raw Data User Manual – Troubles Within 30 Days of Provisioning (Non Trunks)*.

⁸ Step 8 of the *PMAP Raw Data User Manual – Troubles Within 30 Days of Provisioning (Non Trunks)*.

⁹ Step 3 of the *PMAP Raw Data User Manual – Average Completion Notice Interval*.



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reporting period. However, there are no instructions to exclude orders completed before the beginning of the reporting period. The *SQM Reports* specifically state that the denominator of this SQM should be the number of orders completed during the reporting period.

8. Provisioning – Mean Held Order Interval

For the *Mean Held Order Interval* SQM, KCL identified three inconsistencies between the computation instructions and the *SQM Reports*:

- In computing this SQM, the instructions provided by BellSouth prescribe including records for which “so_cmmt_cd = ‘W, X, F, L, or is null’”¹⁰. This computation excludes records for the appointment code “so_cmmt_cd is ‘C, Y and Z.’” which are listed as exclusions in the *SQM Reports* (BellSouth internal/administrative orders). However, the computation also excludes records for which the appointment code is ‘A’ (Special construction in rural area), and M (Work stoppage), which are not listed as exclusions in the *SQM Reports*.
 - The instructions provided by BellSouth prescribe including only records for which “so_missed_cmmt_cd begins with a ‘C’.”¹¹ These records represent appointments missed due to BellSouth reasons. However, records for which “so_missed_cmmt_cd begins with an ‘E’” represent appointments missed due to BellSouth reasons as well. Therefore, not all of the appointments missed due to BellSouth reasons are included in this SQM. This is inconsistent with the *SQM Reports* which specify that “all held orders for BST reasons” should be included in this SQM.
 - The instructions provided by BellSouth prescribe computing the “held duration” as the difference between the report end date and the earliest commitment date for each service order.¹² This is inconsistent with the *SQM Reports* which specify that “held order interval” is computed on service orders that are not complete and passed the currently committed due date.¹³ Service orders might be associated with various commitment dates as provisioning appointments are missed or postponed. The currently committed due date logically implies the latest or most up-to-date committed due date rather than the earliest committed due date.
- 9. Provisioning - Mean Held Order Interval and Distribution Interval, and Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices**

¹⁰ Step 5 of the *PMAP Raw Data User Manual – Held Order Interval*.

¹¹ Step 6 of the *PMAP Raw Data User Manual – Held Order Interval*.

¹² Step 8 and 7 of the *PMAP Raw Data User Manual – Held Order Interval*.

¹³ See Business Rules section for *Provisioning – Mean Held Order Interval and Distribution Interval* in the *SQM Reports*.



For the *Mean Held Order Interval* and *Distribution Interval*, and *Average Jeopardy Notice Interval* and *Percentage of Orders Given Jeopardy Notices* SQMs, the computation instructions provided by BellSouth prescribe excluding orders for disconnection of service (so_type_cd = "D"), which is not listed as an exclusion in the *SQM Reports* for either SQM.

10. Provisioning – *Service Order Accuracy*

Computation instructions for the *Service Order Accuracy* SQM provided by BellSouth indicate that for large sample sizes of service orders¹⁴, when a service request cannot be matched with a specific service order, it is not identified as inaccurate (by default, it becomes classified as an order completed without error) in the numerator, but it is still counted in the denominator. This is inconsistent with the *SQM Reports*.

11. Maintenance and Repair – *Percent Repeat Trouble Within 30 Days*

According to the *SQM Reports*, the *Percent Repeat Trouble Within 30 Days* SQM includes "Customer trouble reports received within 30 days of an original customer trouble report".¹⁵ The instructions provided by BellSouth prescribe counting the number of closed trouble tickets reported during the reporting month that were identified as a repeat trouble. Repeat trouble is defined as any trouble that has previously been reported.

KCL identified two inconsistencies between the computation instructions and the *SQM Reports*:

- Computation instructions include only closed trouble reports in the numerator of the SQM, while the *SQM Reports* describe this SQM as including all troubles reported during the reporting month (i.e. including pending trouble reports).
- Computation instructions prescribe including repeat troubles that occur during the reporting month (without further qualification), while the *SQM Reports* describe the SQM as including only repeat troubles within 30 days of an original customer trouble report.

12. Maintenance and Repair – *Customer Trouble Report Rate*

Computation instructions for the *Customer Trouble Report Rate* SQM include only closed trouble reports in the numerator, while the *SQM Reports* describe the calculation as including all initial and repeated troubles reported during the reporting period (i.e., including pending trouble reports).

¹⁴ A "large" sample size is described in the *SQM Reports* as consisting of 200 or more service orders.

¹⁵ *SQM Reports*, *Business Rules* section.

**13. Maintenance and Repair – *Maintenance Average Duration***

Computation instructions for the *Maintenance Average Duration* SQM prescribe counting all closed trouble tickets received within the reporting period in the denominator, while the *SQM Reports* describe it as the count of trouble tickets closed during the reporting period (some of which might have been received prior to the reporting period).

Summary of BellSouth Response:**“Ordering – Firm Order Confirmation Timeliness**

KCL is correct, the LSRs were included in the reports but weekend hours were excluded. Based on Carrier Notification SN91081623, the hours of operation in the LCSC changed on February 1, 2000. The SQM was updated in the May 2000 SQM to correct the Exclusion and will reflect the new LCSC hours of operation. The Raw Data User Manual was updated for May 2000 to correct the Exclusion.

The SQM update dated May 2000 includes the following Exclusions:

- Rejected LSRs
- Designated Holidays
- The following hours for Non-mechanized LSRs*:
 - Residence Resale Group – from 10:00 PM EST Saturday until 7:00 AM EST Monday
 - Business Resale, Complex, UNE Groups – from 8:00 PM EST Friday until 8:00 AM EST Monday
 - IPC – 4:30 PM CST Friday until 8:00 AM CST Monday

* The hours excluded will be altered to reflect changes in the Center operating hours.

The SQM update scheduled for July 2000 will contain the following Exclusion:

- The following hours for Non-mechanized LSRs are excluded from the interval computation:
 - Residence Resale Group – from 10:00 PM EST Saturday until 7:00 AM EST Monday
 - Business Resale, Complex, UNE Groups – from 8:00 PM EST Friday until 8:00 AM EST Monday
 - IPC – 4:30 PM CST Friday until 8:00 AM CST Monday
 - Designated Holidays

PMAP is not currently excluding weekend hours from the Interconnection Trunk Ordering (Reject Interval and FOC Timeliness) Reports. The following “bullet” will be deleted from the July 2000 SQM update:



- IPC - 4:30 PM CST Friday until 8:00 AM CST Monday

Change Request 5986 was submitted on July 17, 2000 to exclude weekend hours from the Interconnection Trunk reports for Reject Interval and FOC Timeliness. BellSouth has scheduled this Change Request to be worked no later than September 15, 2000.

Ordering - Percent Rejected Service Requests

Changes made to the code in November 1999 created the problem delineated in the Exception. On March 15, 2000, the discrepancy was identified and a Change Request opened. That Request, #5705, was worked with the May upload of April data. Therefore, LSRs that are canceled by the CLEC prior to being rejected/clarified, are now excluded from the data.

The exclusion of Service Requests canceled by the CLEC prior to being clarified / rejected is done from Staging to NODS and therefore, not included in PMAP raw data.

The following is included in the Resolution of Change Request 5705:
The job that was affected by this change was ORSNSRqLon. This change was made and ran in May/April data. Exclusions done from Staging to NODS, does not affect the Raw Data Users Manual.

A copy of CLOSED Change Request #5705 with information from Issue Tracker was provided to KCL on July 20, 2000.

Ordering - Reject Interval

In the May 2000 SQM, the Business Rules were amended to delete the reference to Fatal Rejects. The Reject Interval Definition reads "Reject Interval is the average reject time from receipt of an LSR to the distribution of a Reject. An LSR is considered valid when it is submitted by the CLEC and passes edit checks to insure the data received is correctly formatted and complete." When a "Fatal Reject" occurs, a valid LSR is not created, therefore, Fatal Rejects should not be included in the calculation.

Provisioning - Percent Provisioning Troubles within 30 days of Service Order Activity

The following exclusion will be added to the next SQM update scheduled for July 2000:
****Exclude all troubles caused by CPE (Customer Provided Equipment).**

This report measures all completed service orders, so the "L" exclusion does not apply. The original raw data guide did refer to excluding "L" and that entry was removed in the May 15, 2000 version of the Raw Data User Manual.



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Provisioning – Total Service Order Cycle Time

This exclusion was added to the May 15th version of the Raw Data User Manual in Step 2 as: **“Exclude any records where so_cmtt_cd = ‘L’.**

Provisioning – Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices

BellSouth does not issue Jeopardy Notices for reasons other than facility delays. All records in the raw data for Average Jeopardy Notice Interval capture only orders that have been in jeopardy for facility delay (PF) and therefore, performing the actual exclusion of end user reasons is not needed. BellSouth does feel the note of excluding these orders is necessary to remove any question of customer caused delays being included in the report.

Regarding the non-mechanized order exclusion. BellSouth will remove this entry in the July 2000 version of the SQM. All orders are accessible through CSOTS for all CLECs to review status of their order. This measure reports the time the notice has been released to all systems including electronic systems for the CLECs and CSOTS and therefore the exclusion is no longer valid.

Regarding the order cancelled by the CLEC exclusion, BellSouth removed this entry in the May 2000 version of the SQM.

Provisioning – Average Completion Notice Interval

The following exclusion will be added in the July 2000 update of the SQM:

***Partially mechanized orders.**

In addition, orders received fully mechanized through TAG will be included in this measurement. The May 2000 update to the Raw Data User Manual now reflects the following instructions in Step 3: **‘Include records that have a 0,1,2, or 6 in the tsocs_mthd_acqstn field.’ ‘6’ represents fully mechanized orders received through TAG. Partially mech orders received through TAG are included in ‘9’.**

The May 15th version of the Raw Data user manual was updated to change the entry in Step 4 to read: **‘Include records with a cmplt_n_dt between the first and last day of the reporting month for which the raw data is valid’.**

Provisioning – Mean Held Order Interval

An exclusion will be added to exclude orders held for Special Construction in rural areas in the July 2000 update of the SQM manual. Service order commit codes of ‘M’ were added to computation in the May 15th Raw Data Users Manual as orders due to work stoppage would be considered held orders in the event of a strike.



"E" missed appointment codes have been added to all areas of the May 15th Raw Data User Manual that apply to so_missed_cmmt_cd of "C".

BellSouth attempts to complete the work on all held service orders as soon as possible. This sometimes necessitates trying different methods to provide service and may involve more than one due date change depending upon facility work, situations regarding load or weather conditions, or equipment delays. This report measures if the order is held for company reasons on or after its current due date. An order may have had previous due dates that were held for company reasons and changed to the new due date to attempt to provide service. BellSouth reports the total held time from the first BellSouth caused missed appointment, using the current held reason for the current due date.

BellSouth will update the SQM Business Rules and Calculation in the July 2000 SQM as follows:

Business Rules: Mean Held Order Interval: This metric is computed at the close of each report period. The held order interval is established by first identifying all orders, at the close of the reporting interval, that both have not been reported as completed in SOC's and have passed the currently committed due date for the order. For each such order, the number of calendar days **between the earliest committed due date on which BellSouth had a company missed appointment** and the close of the reporting period is established and represents the held order interval for that particular order. The held order interval is accumulated by the standard groupings, unless otherwise noted, and the reason for the order being held. The total number of days accumulated in a category is then divided by the number of held orders within the same category to produce the mean held order interval. The interval is by calendar days with no exclusions for Holidays or Sundays. CLEC Specific reporting is by type of held order (facilities, equipment, other), total number of orders held, and the total and average days.

Calculation: Mean Held Order Interval: $\Sigma(\text{Reporting Period Close Date} - \text{Earliest Committed Order Due Date with a BellSouth missed appointment}) / (\text{Number of Past Due Orders Held and Pending but not completed and Past The Committed Due Date}).$

Held Order Distribution Interval:

$(\# \text{ Of Orders Held for } \geq 90 \text{ days}) / (\text{Total } \# \text{ of Past Due Orders Held and Pending But Not Completed and past the committed due date}) \times 100$

$(\# \text{ Of Orders Held for } \geq 15 \text{ days}) / (\text{Total } \# \text{ of Past Due Orders Held and Pending But Not Completed and past the committed due date}) \times 100$

Provisioning - Mean Held Order Interval and Distribution Interval, and Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices

The exclusion of D and F (total disconnect and from disconnects on transfer orders) will be added to the July 2000 version of the SQM for Jeopardy Notice Interval. These orders were not mentioned in the previous SQM's as they apply to disconnects which are

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worked on the due date requested by the subscriber and would not be placed in jeopardy for company reasons.

However, it is not necessary to exclude D & F orders from Held Order Interval, as they would not be counted in this measure or in the base of orders.

Orders are held for company reasons and this does not affect D&F orders. As these are disconnect orders placed at the customer request, they are worked on the requested due date. Held Order is a Mean Interval report that only calculates orders that are held and does not use the base of total orders which would include D&F orders. Therefore, since D&F orders are not considered in the calculation of the interval, as they are not held, it is not deemed necessary to specify they are excluded. BellSouth has clarified this policy for KCL and will update the SQM, in the July 2000 version, to say that D&F orders are excluded.

Provisioning – Service Order Accuracy

The following statement will be added to the July 2000 version of the SQM: “For both small and large sample sizes, when a Service Request cannot be matched with a corresponding Service Order, it will not be counted. For small sample sizes an effort will be made to replace the service request.”

Maintenance and Repair – Percent Repeat Trouble Within 30 Days

The definition will be updated in the July 2000 SQM version. The updated definition will read: **Closed trouble reports on the same line/circuit as a previous trouble report received within 30 calendar days as a percent of total troubles closed.**

The Calculation and Business Rules will be updated in the July 2000 SQM version. The updated Calculation will read: **(Count of closed customer troubles where more than one trouble report was received for the same service line within a continuous 30 days of the reporting period) / (Total trouble reports closed in the reporting period) X 100**

The updated Business Rules will read: **Closed customer troubles received within 30 days of an original closed customer trouble report.**

LMOS uses a flag to score troubles that have met the requirements of a repeat. When a original trouble report has been received and closed and a second trouble is received, LMOS waits for the completion of the second trouble and then looks at the issue date of the repeat and if this trouble report is within 30 days, strokes the flag with a one.

Maintenance and Repair – Customer Trouble Report Rate

The Definition, Business Rules, and Calculation for the *Customer Trouble Report Rate* SQM will be updated in the July 2000 SQM version. They will read as follows:



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Definition: Initial and repeated customer direct or referred troubles closed within a calendar month per 100 lines/circuits in service.

Business Rule: Customer trouble report rate is computed by accumulating the number of maintenance initial and repeated trouble reports closed in the reporting period.

Calculation: Customer Trouble report rate = (Count of initial and repeated trouble reports closed in the current period) / (Number of service access lines in service at the end of the report period) X 100

For Maintenance measurements, all trouble reports must be closed to be counted in both the WFA and LMOS systems. This process ensures that only valid trouble reports are included in the measurement. For example, trouble reports that are cancelled by the customer or excluded by BellSouth (due to a non-telephone problem) would not be valid trouble reports.

Maintenance and Repair – Maintenance Average Duration

The actual computation for the Maintenance Average duration SQM prescribes counting all closed troubles tickets within the reporting period in the denominator.

Summary of KCL Re-Test Activities:

KCL re-test activities included:

1. Ordering – Firm Order Confirmation Timeliness

KCL reviewed the changes BellSouth made to the May and July 2000 SQMs. KCL also reviewed changes made to data used in the September Firm Order Confirmation Timeliness metric to confirm the exclusion of weekends from the Interconnection Trunks report.

2. Ordering – Percent Rejected Service Requests

KCL reviewed programming changes BellSouth made to the Percent Rejected Service Requests data upload program.

3. Ordering – Reject Interval

KCL reviewed the changes BellSouth made to the May 2000 SQM.

4. Provisioning – Percent Provisioning Troubles within 30 days of Service Order Activity

KCL reviewed the changes BellSouth made to the July 2000 SQM.



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5. Provisioning – *Total Service Order Cycle Time*

KCL reviewed the changes BellSouth made to the May 2000 Raw Data User Manual.

6. Provisioning – *Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices*

KCL reviewed the changes BellSouth made to the May and July 2000 SQMs.

7. Provisioning – *Average Completion Notice Interval*

KCL reviewed the changes BellSouth made to the May 2000 Raw Data User Manual and the July 2000 SQM.

8. Provisioning – *Mean Held Order Interval*

KCL reviewed the changes BellSouth made to the May 2000 Raw Data User Manual and the July 2000 SQM.

9. Provisioning - *Mean Held Order Interval and Distribution Interval, and Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices*

KCL reviewed the changes BellSouth made to the July 2000 SQM.

10. Provisioning – *Service Order Accuracy*

KCL reviewed the changes BellSouth made to the July 2000 SQM.

11. Maintenance and Repair – *Percent Repeat Trouble Within 30 Days*

KCL reviewed the changes BellSouth made to the July 2000 SQM.

12. Maintenance and Repair – *Customer Trouble Report Rate*

KCL reviewed the changes BellSouth made to the July 2000 SQM.

13. Maintenance and Repair – *Maintenance Average Duration*

KCL reviewed the clarification BellSouth made in response to this exception.



KCL Re-Test Results:

Based upon its review, KCL developed the following conclusions for each issue.

1. Ordering – *Firm Order Confirmation Timeliness*

KCL found the changes BellSouth made to the May and July 2000 SQMs and to the extract queries to be consistent with the documented calculation method and the definition as stated in the SQM for the Firm Order Confirmation Timeliness metric.

2. Ordering – *Percent Rejected Service Requests*

KCL found programming changes BellSouth made to the data upload program to be consistent with the SQM, documented calculation methods and the stated intent of the Percent Rejected Service Requests.

3. Ordering – *Reject Interval*

KCL found the changes BellSouth made to the May 2000 SQM to be consistent with the documented calculation method and the stated intent of the Reject Interval metric.

4. Provisioning – *Percent Provisioning Troubles within 30 days of Service Order Activity*

KCL found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of the Percent Provisioning Troubles within 30 days of Service Order Activity metric.

5. Provisioning – *Total Service Order Cycle Time*

KCL found the changes BellSouth made to the May 2000 Raw Data User Manual and to the extract queries to be consistent with the documented calculation method and the stated intent of the Total Service Order Cycle Time metric.

6. Provisioning – *Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices*

KCL found the changes BellSouth made to the May and July 2000 SQMs to be consistent with the documented calculation method and the stated intent of the Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices metric.



7. Provisioning – *Average Completion Notice Interval*

KCL found the changes BellSouth made to the May 2000 Raw Data User Manual and July, 2000 SQM to be consistent with the documented calculation method and the stated intent of the Average Completion Notice Interval metric.

8. Provisioning – *Mean Held Order Interval*

KCL found the changes BellSouth made to the May 2000 Raw Data User Manual and July 2000 SQM to be consistent with the documented calculation method and the stated intent of the Mean Held Order Interval metric.

9. Provisioning - *Mean Held Order Interval and Distribution Interval, and Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices*

KCL found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation methods and the stated intents of the Mean Held Order Interval and Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices metrics.

10. Provisioning – *Service Order Accuracy*

KCL found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of the Service Order Accuracy metric.

11. Maintenance and Repair – *Percent Repeat Trouble Within 30 Days*

KCL found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of the Percent Repeat Trouble Within 30 Days metric.

12. Maintenance and Repair – *Customer Trouble Report Rate*

KCL found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of the Customer Trouble Report Rate metric.

13. Maintenance and Repair – *Maintenance Average Duration*

KCL found the response BellSouth made to this exception clarified the inconsistency thought to exist between the SQM and computational instructions.

CLOSURE REPORT FOR EXCEPTION 87

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As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 87.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 87.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 97

BellSouth Georgia OSS Testing Evaluation

Date: January 5, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth does not deliver timely Firm Order Confirmation (FOC) responses to non-flow through local service requests (LSRs).

Summary of Exception:

Background: In response to a valid Local Service Request¹ (LSR), BellSouth returns a FOC. This FOC provides notification to the CLEC that its order is confirmed and provides a committed due date for completion of service provisioning. FOCs are generated for two types of service requests:

1. Flow Through

A flow through service request proceeds through back-end order validation systems to generate a FOC without any manual intervention.

2. Non Flow Through

A non-flow through service requests is submitted electronically and drops out for manual handling by a BellSouth ordering representative at some point during the order validation process prior to FOC generation.

Based on timeliness standards within Service Quality Measurements (SQMs) approved by the Georgia Public Service Commission on June 6, 2000, KPMG Consulting LLC (KCL) expects to receive 95% of Flow Through FOCs within three hours and 85% of Non-Flow Through FOCs within 36 hours.

BellSouth Performance²: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely non-flow through FOCs.

- 79% of non-flow through FOCs were returned via the TAG interface within the specified timeframe³.

¹ According to the *BellSouth-Georgia Service Quality Measurements (SQMs), Draft Version 1.4, p.14*, a service request is not considered valid until it passes system edits to ensure all required fields are populated. An "Invalid" LSR will be returned to a CLEC as a Fatal Reject.

² This exception includes data for LSRs submitted through June 2, 2000. A number of Local Number Portability (LNP) service requests are *excluded* from this data set. Information on fully versus partially mechanized CLR responses for certain LNP orders was not available from BellSouth.

CLOSURE REPORT FOR EXCEPTION 97

BellSouth Georgia OSS Testing Evaluation

- 83% of non-flow through FOCs were returned via the EDI interface within the specified timeframe⁴.

The following tables provide a detailed breakdown of response time for non-flow through FOCs⁵.

Non-Flow Through FOC Timeliness Summary

FOCs received via TAG					
< 24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs	Total
134	31	30	7	7	209
64%	15%	14%	3%	3%	100%
FOCs received via EDI					
< 24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs	Total
117	34	16	5	10	182
64%	19%	9%	3%	5%	100%

Summary of BellSouth's Response:

"The PONs listed in this exception were processed by BellSouth through 6/2/00. BellSouth standard was 48 hours for returning non-flow through Firm Order Confirmations (FOCs) at the time of this test. On 6/6/00, the Georgia PSC set new standards for BellSouth as described by KPMG in this exception, 85% within 36 hours.

BellSouth results based on BellSouth standards at the time of this test:

FOCs received via TAG					
		< 48 hrs	48-72 hrs	> 72 hrs	Total
		195	7	7	209
		94%	3%	3%	100%
FOCs received via EDI					
		< 48 hrs	48-72 hrs	> 72 hrs	Total
		167	5	10	182
		92%	3%	5%	100%

³ Response timeliness improved after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness of response issues. For non-flow through FOCs received between 2/8/00 and 6/2/00, 83% were returned within 36 hours via TAG.

⁴ Response timeliness improved after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness issues. For non-flow through FOCs received between 2/8/00 and 6/2/00, 87% were received within 36 hours via EDI.

⁵ KPMG used Actual Flow Through data (provided by BellSouth as part of the Flow Through Evaluation) to determine whether FOCs were flow through or non-flow through.

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Since the BellSouth internal standard for non-flow through FOCs was 48 hrs at the time of this test, a sample of the 46 PONs included in the 36-48 hrs categories were reviewed. All of the PONs included in the 48-72 hrs and >72 hrs categories were reviewed. Due to the time elapsed from receipt of the listed PONs and receipt of this exception, data for 9 PONs has been archived. In addition, 2 of the PONs listed were not received by BellSouth.

Summary of findings for PONs reviewed by BellSouth:

Category	Total PONs in Category	PONs Reviewed in Category	BellSouth Does not agree	BellSouth Agrees	Unable to locate PON
TAG 36-48 hrs	30	12	1	11	
EDI 36-48 hrs	16	7	0	7	
TAG 48-72 hrs	7	7	3	1	3
EDI 48-72 hrs	5	5	2	1	2
TAG > 72 hrs	7	7	0	3	4
EDI > 72 hrs	10	10	4	4	2

In summary, BellSouth disagrees with the categorization of 4 out of 26 sampled TAG FOCs (15%). Additionally, BellSouth disagrees with the categorization of 6 out of 22 sampled EDI FOCs (27%). Given this analysis, BellSouth's results would increase to 82% and 88% of FOCs within 36 hours, respectively for TAG and EDI. All of these LSRs were processed prior to the new standards. BellSouth is currently developing and executing procedures to meet the interim standards that were set by the Georgia PSC on 6/6/00. The progress of these efforts will be tracked in the Service Quality Measures results that are filed each month with the GA PSC."

Summary of KCL Re-test Activities:

KCL initiated re-test activities on August 25, 2000. Over 200 Local Service Requests (LSRs) were submitted to BellSouth via the TAG and EDI ordering interfaces. KCL calculated the response times for all NFT FOCs received. FOCs were classified as NFT

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based on BellSouth data provided to KCL's Flow Through Team. Using this BellSouth data, KCL identified the actual system performance for each order and determined whether manual intervention was required by ordering representatives.⁶

KCL Re-test Results:

For purposes of this evaluation, the Georgia Public Service Commission (GPSC) issued standard for NFT FOC timeliness is 85% within 36 hours. Based on an analysis of re-test orders, KCL determined that 92% of NFT FOCs processed via TAG were received within 36 hours. 100% of NFT FOCs processed via EDI were received within 36 hours. In addition, 100% of FOCs associated with orders for which actual FT/NFT classifications were unavailable were returned within 36 hours.

As a result of the review activities, KCL believes that BellSouth has adequately addressed the issues identified in Exception 97.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 97.

Attachments: None.

⁶ KCL was unable to obtain BellSouth actual FT/NFT classifications on a number of service requests.



CLOSURE REPORT FOR EXCEPTION 110

BellSouth Georgia OSS Testing Evaluation

Date: January 5, 2001

EXCEPTION CLOSURE REPORT

Exception:

KPMG Consulting LLC (KCL) cannot replicate four of BellSouth's reported Service Quality Measurements (SQMs).

Summary of Exception:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KCL is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KCL has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance³ from BellSouth when necessary.

KCL has been unable to replicate the following SQM values for the KCL CLEC for the months of March and June:

1. **Average Completion Notice Interval in the Provisioning category for the KCL Test CLEC (June 2000).** KCL was unable to replicate the BellSouth-reported SQM values, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KCL Calculation	BellSouth Report
OCN 9990; ACNI Distribution 0-1 Hour; Business; Dispatch; <10 circuits	0	1

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The manual is posted and updated on the PMAP site.

³ "Technical Assistance" refers to any calculation instruction KCL may have received in the replication of CLEC aggregate or non-PMAP (manually calculated) metrics.

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Category	KCL Calculation	BellSouth Report
OCN 9990; Average Completion Notice Interval; Business; Dispatch; <10 circuits	0	.02
OCN 9992; ACNI Distribution 0-1 Hour; UNE Non-Design; Dispatch; <10 circuits	0	1
OCN 9992; Average Completion Notice Interval; UNE Non-Design; Dispatch; <10 circuits	0	.02
OCN 9992; ACNI Distribution 0-1 Hour; UNE Non-Design; Non-Dispatch; <10 circuits	0	1
OCN 9992; Average Completion Notice Interval; UNE Non-Design; Non-Dispatch; <10 circuits	0	.02
OCN 9993; ACNI Distribution 0-1 Hour; Residence; Non-Dispatch; <10 circuits	0	1
OCN 9993; Average Completion Notice Interval; Residence; Non-Dispatch; <10 circuits	0	.95
OCN 9994; ACNI Distribution 0-1 Hour; UNE Non-Design; Non-Dispatch; <10 circuits	0	1

2. **Firm Order Confirmation** in the Ordering category for the KCL Test CLEC (June 2000). KCL was unable to replicate the BellSouth reported SQM values for the *Fully Mechanized* and *Total Mechanized* reports, using BellSouth instructions. The discrepancies are detailed in the following table.

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Category	KCL Calculation	BellSouth Report
Mechanized; OCN 9991; Residence; LSR Count (0- <15)	110	185
Mechanized; OCN 9991; Business; LSR Count (0- <15)	59	90
Mechanized; OCN 9991; UNE; LSR Count (0-<15)	206	356
Mechanized; OCN 9991; Other; LSR Count (0-<15)	112	222
Mechanized; OCN 9991; Residence; 0-<15 Min	0.092282	0.155201
Mechanized; OCN 9991; Business; 0-<15 Min	0.082633	0.126050
Mechanized; OCN 9991; UNE; 0-<15 Min	0.110160	0.190374
Mechanized; OCN 9991; Other; 0-<15 Min	0.078707	0.156008
Mechanized; OCN 9991; Residence; LSR Count (15- <30)	1035	960
Mechanized; OCN 9991; Business; LSR Count (15- <30)	623	592
Mechanized; OCN 9991; UNE; LSR Count (15-<30)	1624	1474
Mechanized; OCN 9991; Other; LSR Count (15-<30)	1288	1178
Mechanized; OCN 9991; Residence; 15-<30 Min	0.868289	0.805369
Mechanized; OCN 9991; Business; 15-<30 Min	0.872549	0.829132
Mechanized; OCN 9991; UNE; 15-<30 Min	0.868449	0.788235
Mechanized; OCN 9991; Other; 15-<30 Min	0.905130	0.827829
Total Mechanized; OCN 9991; Residence; LSR Count (0-<15)	110	185
Total Mechanized; OCN 9991; Business; LSR Count	59	90

CLOSURE REPORT FOR EXCEPTION 110

BellSouth Georgia OSS Testing Evaluation

Category	KCL Calculation	BellSouth Report
(0-<15)		
Total Mechanized; OCN 9991; UNE; LSR Count (0-<15)	206	356
Total Mechanized; OCN 9991; Other; LSR Count (0-<15)	112	222
Total Mechanized; OCN 9991; Residence; 0-<15 Min	0.092282	0.155201
Total Mechanized; OCN 9991; Business; 0-<15 Min	0.082633	0.12605
Total Mechanized; OCN 9991; UNE; 0-<15 Min	0.11016	0.190374
Total Mechanized; OCN 9991; Other; 0-<15 Min	0.078652	0.155899
Total Mechanized; OCN 9991; Residence; LSR Count (15-<30)	1035	960
Total Mechanized; OCN 9991; Business; LSR Count (15-<30)	623	592
Total Mechanized; OCN 9991; UNE; LSR Count (15-<30)	1624	1474
Total Mechanized; OCN 9991; Other; LSR Count (15-<30)	1288	1178
Total Mechanized; OCN 9991; Residence; 15-<30 Min	0.868289	0.805369
Total Mechanized; OCN 9991; Business; 15-<30 Min	0.872549	0.829132
Total Mechanized; OCN 9991; UNE; 15-<30 Min	0.868449	0.788235
Total Mechanized; OCN 9991; Other; 15-<30 Min	0.904494	0.827247

**CLOSURE REPORT FOR EXCEPTION 110**

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3. *Jeopardy Interval and Percent Jeopardy in the Provisioning category for the KCL Test CLEC (June 2000).* KCL was unable to replicate the BellSouth reported SQM values, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KCL Calculation	BellSouth Report
OCN 9993; Business; # of Jpdy	0	1
OCN 9993; Business; Total Intvl (Hrs)	0	72
OCN 9993; Business; Avg Intvl (Hrs)	0	72
OCN 9993; Business; Total Orders	0	3
OCN 9993; Business; % Jpdy	0	0.3333
OCN 9991; Residence; Total Orders	0	3
OCN 9991; Business; Total Orders	0	1
OCN 9991; Design; Total Orders	0	1
OCN 9991; UNE Non- Design; Total Orders	0	1
OCN 9992; Residence; Total Orders	0	1
OCN 9992; UNE Non- Design; Total Orders	0	3
OCN 9993; Residence; Total Orders	0	1
OCN 9994; UNE Non- Design; Total Orders	0	2

4. *Jeopardy Interval and Percent Jeopardy in the Provisioning category for the KCL Test CLEC (March 2000).* KCL was unable to replicate the BellSouth reported SQM values, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KCL Calculation	BellSouth Report
OCN 9991; Residence; # of Jpdy	3	4
OCN 9991; Residence; Total Intvl (Hrs)	504	600

**CLOSURE REPORT FOR EXCEPTION 110**

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Category	KCL Calculation	BellSouth Report
OCN 9991; Residence; Avg Intvl (Hrs)	168.00	150.00
OCN 9991; Residence; Total Orders	46	47
OCN 9991; Residence; % Jpdy	6.52%	8.51%
OCN 9991; GA; # of Jpdy	9	10
OCN 9991; GA; Total Intvl (Hrs)	2328	2424
OCN 9991; GA; Avg Intvl (Hrs)	258.67	242.40
OCN 9991; GA; Total Orders	139	140
OCN 9991; GA; % Jpdy	6.47%	7.14%
OCN 9991; 9991; # of Jpdy	9	10
OCN 9991; 9991; Total Intvl (Hrs)	2328	2424
OCN 9991; 9991; Avg Intvl (Hrs)	258.67	242.40
OCN 9991; 9991; Total Orders	139	140
OCN 9991; 9991; % Jpdy	6.47%	7.14%
OCN 9994; UNE Non-Design; Total Orders	52	53
OCN 9994; UNE Non-Design; % Jpdy	13.46%	13.21%
OCN 9994; GA; Total Orders	75	76
OCN 9994; GA; % Jpdy	13.33%	13.16%
OCN 9994; 9994; Total Orders	75	76
OCN 9994; 9994; % Jpdy	13.33%	13.16%
CKS; # of Jpdy	20	21
CKS; Total Intvl (Hrs)	4680	4776
CKS; Avg Intvl (Hrs)	515.47	227.43
CKS; Total Orders	426	428
CKS; % Jpdy	4.69%	4.91%



Summary of BellSouth Response:

1. Average Completion Notice Interval in the Provisioning category for the KCL Test CLEC (June 2000).

BellSouth agrees that KCL was unable to replicate the BellSouth-reported SQM values, *Average Completion Notice Interval* in the Provisioning category for the KCL Test CLEC (June 2000), using BellSouth instructions.

Shortly after the reports were posted and viewed by KCL, a data rerun for June was necessary due to code changes, specifically, Change Request #5922. This code change required that TSOCT_MTHD_ACQSTN_ID = '6'. However, it also erroneously allowed TSOCT_MTHD_ACQSTN_ID = '3' in the report.

This was discovered immediately after the reports were posted. The reports were subsequently removed from the web and rerun with the correct logic. BellSouth will provide KCL with a new report for June 2000 for *Average Completion Notice Interval* for the KCL Test CLEC.

2. Firm Order Confirmation in the Ordering category for the KCL Test CLEC (June 2000).

BellSouth agrees that KCL was unable to replicate *Firm Order Confirmation* for the KCL Test CLEC (June 2000) data for Fully Mechanized, Partial Mechanized, and Total Mechanized reports using BellSouth instructions. The reason for this problem is that records are being placed into the incorrect time "buckets". Records are placed into buckets based on the value in the foc_duration field (* 60 to get minutes). Currently the code is placing records into the buckets based on different interval values than the ones defined in the SQM and displayed on the reports. The code is using the buckets of $0 \leq \text{foc_duration} < 16$ and $16 \leq \text{foc_duration} < 30$ while the SQM and reports use buckets of $0 \leq \text{foc_duration} < 15$ and $15 \leq \text{foc_duration} < 30$.

To resolve this problem the table DD_INTVL_MIN needs to be changed so that the value in the field INTVL_FOC_MIN_BLK_ID = 15 where INTVL_MIN_ID = 15. This change should also be made in the text file that loads the table DD_INTVL_MIN so that this change will be carried forward in future months. This change request has been entered in the Issue Tracker as # 5848. BellSouth provided KCL with a new June report to address the changes that were effective in June.

CLOSURE REPORT FOR EXCEPTION 110

BellSouth Georgia OSS Testing Evaluation

Change Request 5848 corrected the "Mechanized" FOC interval buckets as shown:

0 - <15 min	4 - <8 hrs
15 - <30 min	8 - <12 hrs
30 - <45 min	12 - <16 hrs
30 - <45 min	16 - <20 hrs
45 - <60 min	20 - <24 hrs
45 - <60 min	24 - <48 hrs
60 - <90 min	>= 48 hrs
90 - <120 min	
120 - <240 min	

3. Jeopardy Interval and Percent Jeopardy in the Provisioning category for the KCL Test CLEC (June 2000)

KCL was unable to replicate numbers from the BellSouth reports for *Jeopardy Interval and Percent Jeopardy* for June 2000. BellSouth was able to replicate all of the BellSouth reported values for this month using the most recent version of the Raw Data Users Guide. The instructions for *Jeopardy Interval & Percent Jeopardy* were updated in the July 26, 2000 version of the Raw Data Users Guide. Using the July 26, 2000 version of the Raw Data Users Guide, KCL should be able to replicate the BellSouth reported values for *Jeopardy Interval and Percent Jeopardy* for June 2000.

KCL was unable to replicate the Jeopardy Interval and Percent Jeopardy report for June 2000. BellSouth was able to replicate this report. At the request of BellSouth, KCL provided a copy of the raw data file they were using to replicate the report. BellSouth found that the raw data file KCL was using had been truncated and only contained a subset of the entire raw data file. BellSouth sent a new copy of the raw data file by e-mail to KCL which enabled KCL to replicate the Jeopardy Interval and Percent Jeopardy report for June 2000.

4. Jeopardy Interval and Percent Jeopardy in the Provisioning category for the KCL Test CLEC (March 2000).

KCL was unable to replicate numbers from the BellSouth reports for *Jeopardy Interval and Percent Jeopardy* for March 2000. BellSouth was able to replicate all of the BellSouth reported values for this month using the most recent version of the Raw Data Users Guide. The instructions for *Jeopardy Interval & Percent Jeopardy* were updated in the July 26, 2000 version of the Raw Data Users Guide. Using the July



26, 2000 version of the Raw Data Users Guide. KCL should be able to replicate the BellSouth reported values for *Jeopardy Interval and Percent Jeopardy* for March 2000.

Summary of KCL Re-Test Activities (by Issue Number):

1. Average Completion Notice Interval in the Provisioning category for the KCL Test CLEC (June 2000).

Based upon BellSouth's responses, KCL requested and received the revised report from BellSouth. KCL then compared the values in this revised report to the original KCL calculations. Additionally, KCL reviewed all the KCL Test CLEC SQM reports since June 2000. (KCL reviews the KCL Test CLEC reports for every month as a part of its regular testing activities.)

2. Firm Order Confirmation in the Ordering category for the KCL Test CLEC (June 2000).

Based upon BellSouth's responses, KCL received the revised report from BellSouth. KCL then compared the values in this revised report to the original KCL calculations. Additionally, KCL reviewed all the KCL Test CLEC SQM reports since June 2000. (KCL reviews the KCL Test CLEC reports for every month as a part of its regular testing activities.)

3. Jeopardy Interval and Percent Jeopardy in the Provisioning category for the KCL Test CLEC (June 2000)

KCL received the revised data file from BellSouth. KCL then recalculated the SQM values using this data file, and compared the results with the original BellSouth-reported values. Additionally, KCL reviewed all the KCL Test CLEC SQM reports since June 2000. (KCL reviews the KCL Test CLEC reports for every month as a part of its regular testing activities.)

4. Jeopardy Interval and Percent Jeopardy in the Provisioning category for the KCL Test CLEC (March 2000).

Based upon BellSouth's responses, KCL revised its computer programs to incorporate the methodology detailed in the July 26, 2000 version of the *Raw Data Users Manual*. KCL then compared the resulting values to the BellSouth-reported values. Additionally, KCL reviewed all the KCL Test CLEC SQM reports since



CLOSURE REPORT FOR EXCEPTION 110

BellSouth Georgia OSS Testing Evaluation

March 2000. (KCL reviews the KCL Test CLEC reports for every month as a part of its regular testing activities.)

KCL Re-Test Results (by Issue Number):

1. Average Completion Notice Interval in the Provisioning category for the KCL Test CLEC (June 2000).

The BellSouth-reported values in the revised SQM report matched exactly the original KCL-calculated values. Further, the values KCL calculated for the SQM reports for July and August 2000 matched exactly those reported by BellSouth.

2. Firm Order Confirmation in the Ordering category for the KCL Test CLEC (June 2000).

The BellSouth-reported values in the revised June SQM report matched the KCL-calculated values. Further, the values KCL calculated for the SQM reports for July and August 2000 matched exactly those reported by BellSouth.

3. Jeopardy Interval and Percent Jeopardy in the Provisioning category for the KCL Test CLEC (June 2000)

When KCL used the revised data file that was provided by BellSouth to recalculate the SQM values, the resulting recalculated values matched exactly the original BellSouth-reported values. Further, the values KCL calculated for the SQM reports for July and August 2000 matched exactly those reported by BellSouth.⁴

4. Jeopardy Interval and Percent Jeopardy in the Provisioning category for the KCL Test CLEC (March 2000).

When KCL implemented the instructions found in the July 26, 2000 version of the *Raw Data User Manual*, the resulting recalculated values matched exactly the BellSouth-reported values. Further, the values KCL calculated for this SQM subsequent to those posted in the March 2000 report matched exactly those reported by BellSouth with the exception of those for June 2000. (KCL is now able to match the June 2000 values as well – see issue 3 above.)

⁴ KCL could not determine the cause of the file truncation in the original test.



CLOSURE REPORT FOR EXCEPTION 110

BellSouth Georgia OSS Testing Evaluation

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 110.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 110.

Attachments: None.



Date: January 5, 2001

EXCEPTION CLOSURE REPORT**Exception:**

KPMG Consulting LLC (KCL) cannot replicate one of BellSouth's reported Service Quality Measurements (SQMs) for the month of July 2000.

Summary of Exception:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KCL is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KCL has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance³ from BellSouth.

KCL has been unable to replicate the following SQM values:

1. **Total Service Order Cycle Time in the Provisioning category for the KCL Test CLEC (July 2000).** The discrepancies found by KCL are listed in the table below:

Category	KCL Calculations	BellSouth's Report
Non-Dispatch OCN 9994 UNE Non-Design < 10 Circuits > 30 Days	1	0
Non-Dispatch OCN 9994	109	0

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) web site.

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site.

³ Technical Assistance" refers to any calculation instruction KCL may have received in the replication of CLEC aggregate or non-PMAP (manually calculated) metrics.

**CLOSURE REPORT FOR EXCEPTION 111**

BellSouth Georgia OSS Testing Evaluation

Category	KCL Calculations	BellSouth's Report
UNE Non-Design < 10 Circuits Average Interval (Days)		

Summary of BellSouth's Response:

KCL was unable to replicate the July 2000 test CLEC report for *Total Service Order Cycle Time* (TSOCT). BellSouth was able to replicate the July 2000 test CLEC TSOCT report with the following changes, from CR # 478, to the Raw Data Users Manual.

Change #1

For the July 2000 version of the RDUM for the Total Service Order Cycle Time measure the following bullet point should be added to Step #3: 'Include records that have an so_cmmt_type_cd = 1 which indicates an original commitment.'

This change the RDUM will enable the selection of only records that indicate an original commitment. This change will be incorporated in the next release of the RDUM.

Change #2

For the May 2000 version of the RDUM for the Total Service Order Cycle Time measure Step # 4 should read 'Filter records on so_nbr/issu_dt and identify where the same so_nbr/issu_dt combination appears more than once. Keeping the first record, exclude all duplicate references to that so_nbr/issu_dt combination.'

This change to the RDUM is necessary because unique orders are defined by the combination of the so_nbr and issu_dt fields. This change was incorporated in the October 4, 2000 Version 2.0.10 release of the RDUM.

The exclusion "so_cmmt_cd is null" was inadvertently removed from the RDUM in July, but was added back in the October 4, 2000 Version 2.0.10 release of the RDUM.

Summary of KCL Re-Test Activities:

KCL revised its computer programs to reflect the computation instructions detailed in the October 4, 2000 version of the *Raw Data Users Manual*. KCL then compared its recalculated values to the original BellSouth-reported values, and compared the updated computation instructions to the information described in BellSouth's above response.



CLOSURE REPORT FOR EXCEPTION 111

BellSouth Georgia OSS Testing Evaluation

Additionally, KCL reviewed all the KCL Test CLEC SQM reports since July 2000. (KCL reviews the KCL Test CLEC reports for every month as a part of its regular testing activities.)

KCL Re-Test Results:

When KCL implemented the instructions found in the October 4, 2000 version of the *Raw Data User Manual*, the resulting calculated values matched the original BellSouth-reported values. The *Raw Data User Manual's* computation instructions corresponded to the information in BellSouth's response above.

Further, the values KCL calculated for this SQM subsequent to those posted in the July 2000 report match those reported by BellSouth, exactly, through September 2000.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 111.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 111.

Attachments: None.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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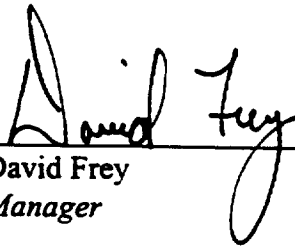
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January 5, 2001

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
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RECEIVED

JAN 05 2001

EXECUTIVE SECRETARY
G.P.S.C.

RE: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems: Docket No. 8354-U

Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 117 (Amended) and Exception 119. Please also find enclosed the following responses from BellSouth: Exception 76 BLS 2nd Amended Response: Exception 117 BLS Amended Response: and Exception 119 BLS Response.

We request that these documents be filed in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,

David Frey
Manager

Enclosures

cc: Parties of Record



EXCEPTION 117 (Amended)

BellSouth Georgia OSS Testing Evaluation

Date: December 19, 2000

EXCEPTION REPORT

An exception has been identified as a result of the xDSL Functional Evaluation (PO&P12).

Exception:

BellSouth did not provide a Clarification/Rejection response to a Loop Make-Up (LMU) Service Inquiry within the specified seven-day interval.

According to the *BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1)*¹ from the Interconnect website, a CLEC should receive a Clarification/Rejection response to an LMU/SI within seven working days. KPMG Consulting LLC (KCL) submitted 15² LMU Service Inquiry forms with the following PONs and received the Clarification/Rejection response after the seven day interval:

PON	Date LMU/SI Sent	Date CLR/Reject Received
X0R01A	8/8/00	9/1/00
X0R02A	8/9/00	9/1/00
X0R04A	8/8/00	9/7/00
X0R05A	8/8/00	9/1/00
X0R08A	8/8/00	9/7/00
X0R10A	8/8/00	9/7/00
X0R12A	8/8/00	9/9/00
X0R34A	8/30/00	9/14/00
X0R35A	8/23/00	9/13/00
X0R36A	8/23/00	9/13/00
X0R40A	8/23/00	9/13/00
X0R43A	8/23/00	9/14/00
X0R44A	8/23/00	9/14/00
X0R48A	8/23/00	9/13/00
X0R52A	8/29/00	9/19/00

¹ BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1):

http://www.interconnection.bellsouth.com/products/UNE_bstlmupdf

² During functional testing, 152 LMU-SI/Local Service Requests were submitted to the BellSouth Complex Resale Support Group.

EXCEPTION 117 (Amended)

BellSouth Georgia OSS Testing Evaluation

Impact:

The absence of a Clarification/Rejection response to an LMU Service Inquiry will delay the ordering of xDSL services. This will negatively impact customer satisfaction with the CLEC. The CLEC will also incur additional cost and time related to researching the status of the LMU.

EXCEPTION 119

BellSouth Georgia OSS Testing Evaluation

Date: November 6, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning Service Quality Measurements (SQMs).

Exception:

BellSouth-reported raw data values for Completion Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for one provisioning metric.

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.¹

As part of the BellSouth-Georgia OSS Evaluation, KCL is comparing the data that BellSouth uses to produce SQM reports for the KCL test CLEC with the corresponding data that KCL collects using its own test management tools. For each of the Provisioning metrics – *Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices (JPDY)*, *Percent Missed Installation Appointments (PMI)*, *Average Completion Interval / Order Completion Interval Distribution (OCI)*, *Average Completion Notice Interval (ACNI)*, and *Total Service Order Cycle Time (TSOCT)* – KCL compared the BellSouth-reported values for COMPLETION DATE² in the raw data files with the completion date that KCL received from Hewlett Packard for March through September 2000.

KCL could not match the BellSouth-reported values in this field with the corresponding KCL-collected values for certain purchase order numbers and service order numbers. Table 1 lists the purchase order numbers specific discrepancies for Completion Date.

¹ These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

² COMPLETION DATE is the actual date of completion of a service order.

EXCEPTION 119

BellSouth Georgia OSS Testing Evaluation

TABLE 1—COMPLETION DATE

PON	SERVICE ORDER NUMBER	RAW DATA FILE	BLS- REPORTED VALUE	KCL- REPORTED VALUE	MONTH
B100001PEJ101069	NP5M4544	JPDY	None	8/4/00	July
F10C121PEN101002	DO3H8C92	JPDY	None	8/2/00	July
F12C121PEN101003	DO8FR6M1	JPDY	None	8/2/00	July
303R222PEH000002	CO0FWMC9	JPDY	None	10/5/00	September
307R122PEH000003	CO646VD9	JPDY	None	10/3/00	September
315R212PTH000005	CODJQDQ0	JPDY	None	10/9/00	September
323R122PEH002001	DP4C6GR1	JPDY	None	10/5/00	September
323R122PTH100003	DODP2694	JPDY	None	10/9/00	September
324R112PEH000001	CO477D06	JPDY	None	10/4/00	September
422R114PEJ100003	NO4575K2	JPDY	None	10/10/00	September
428R124PEJ100004	NP993VF0	JPDY	None	10/4/00	September
441R214PTJ000003	CPW3G381	JPDY	None	9/21/00	September
444R214PTJ100002	DPB5FYN7	JPDY	None	10/9/00	September
452R216PTF000002	RP7BNJW8	JPDY	None	10/2/00	September
627R214PTJ100004	CPV7D650	JPDY	None	10/6/00	September

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. If SQM reports are based on incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.

**BELLSOUTH'S SECOND AMENDED RESPONSE TO
EXCEPTION 76**



December 18, 2000

EXCEPTION REPORT

An exception has been identified because of the Provisioning Verification Evaluation Retest.

Exception:

KPMG Consulting LLC (KCL) encountered BellSouth Switch Translations and directory listings provisioning errors for UNE-P orders.

During provisioning verification testing, data from confirmed Local Service Requests (LSRs) was compared to switch translation data and the directory listing database.

Of the 89 switch translations for lines that were validated, 22 lines (24.7%) contained – information inconsistent with the corresponding LSRs. Of the 22 lines, five (22.7%) were flow-through and 17 (77.3%) were non-flow through.

Of the 55 directory listing orders, 34 were provisioned incorrectly, resulting in a 61.8% failure rate. Of the 34 orders, five (14.7%) listings were not listed in the database while 29 (85.3%) orders were listed incorrectly.

BellSouth and KCL are still researching CSR verification.

The following tables provide the specific data.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 76

SWITCH TRANSLATIONS

PON	TN	OCN	Switch Translations Discrepancy	VER	F/T	BellSouth Response
404R223PTM100002	(912) 746-1503	9994	No NST	AA	Y	Do not agree. feature verified working.
404R223PTM100002	(912) 746-7577	9994	No NST	AA	Y	Do not agree. feature verified working.
404R223PTM102001	(706) 823-0299	9994	No NST	AB	Y	Do not agree. feature verified working.
404R223PTM102001	(706) 823-1802	9994	No NST	AB	Y	Do not agree. feature verified working.
409R223PEM101001	(912) 755-9434	9990	No ESX	AA	Y	Do not agree. feature verified working.
415R213PTM001002	(706) 303-9662	9990	Not working	AA	N	Agree. service not restored from suspension.
415R213PTM001002	(706) 303-2317	9990	Not working	AA	N	Agree. service not restored from suspension.
415R213PTM001002	(706) 303-2318	9990	Not working	AA	N	Agree. service not restored from suspension.
415R213PTM001002	(706) 303-2319	9990	Not working	AA	N	Agree. service not restored from suspension.
605R214PEJ000002	(912) 742-6359	9994	No NSD	AA	N	Do not agree. feature verified working.
605R214PEJ000002	(912) 742-6728	9994	No NSD	AA	N	Do not agree. feature verified working.
605R214PTJ000001	(706) 722-9484	9994	Wrong PIC & LPIC. no NSD	AA	N	Agree. PIC and LPIC incorrect. Service Rep error. Rep covered 12/15/00. Do not agree. feature NSD verified working.
605R214PTJ000001	(706) 722-9194	9994	Wrong PIC. no NSD	AA	N	Agree. PIC and LPIC incorrect. Service Rep error. Rep covered 12/15/00. Do not agree. feature NSD verified working.
625R214PTJ000002	(912) 746-4538	9990	Wrong PIC & LPIC. no Hunting	AB	N	Agree. PIC and LPIC incorrect. Service Rep error. Rep covered 12/15/00. Do not agree. hunting verified working.
625R214PTJ000002	(912) 746-5245	9990	Wrong PIC & LPIC. no Hunting	AB	N	Agree. PIC and LPIC incorrect. Service Rep error. Rep covered 12/15/00. Do not agree. hunting verified working.
625R214PTJ000002	(912) 746-6152	9990	Wrong PIC & LPIC. no Hunting	AB	N	Agree. PIC and LPIC incorrect. Service Rep error. Rep covered 12/15/00. Do not agree. hunting verified working.
625R214PTJ000003	(706) 774-1688	9990	Wrong PIC & LPIC	AB	N	Agree. Service Rep error. Rep covered 12/15/00.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 76

PON	TN	OCN	Switch Translations Discrepancy	VER	F/T	BellSouth Response
625R214PTJ000003	(706) 774-6550	9990	Wrong PIC	AB	N	Agree. Service Rep error. Rep covered 12/15/00.
625R214PTJ000003	(706) 774-9891	9990	Wrong PIC	AB	N	Agree. Service Rep error. Rep covered 12/15/00.
625R214PTJ000005	(912) 746-0461	9990	Should not have NSQ	AA	N	Switch verification in progress
625R214PTJ000005	(912) 746-1330	9990	Should not have NSQ	AA	N	Switch verification in progress
625R214PTJ000005	(912) 746-7343	9990	Should not have NSQ	AA	N	Agree. requested HBY (annoy cl rej) NSQ (repeat dialing) shown in switch.

DIRECTORY LISTINGS VERIFICATION

PON	FT	OCN	TN	Directory Listing Discrepancy	Order Type	VER	BellSouth Response
301R112PEF000009	N	9991	(706) 434-0845	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.
305R112PEF100011	Y	9991	(706) 434-0808	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.
305R112PEF101020	Y	9991	(706) 434-0851	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.
305R112PTF002001	N	9994	(706) 434-0806	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.
305R112PTF100012	Y	9994	(912) 314-0807	Should be listed as Rwh but listed as R W H.	UNE-Analog Loop	1	Do not agree. Listed as requested.
305R112PTF100013	N	9994	(404) 214-0684	Number is listed as "non-published" and "listed umber". Should only be LN.	UNE-Analog Loop	2	Do not agree. Listed as requested.
307R122PEF001009	N	9994	(404) 214-0685	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.
307R122PEF001010	N	9994	(912) 314-0809	Should be listed as RWH but listed as R W H.	UNE-Analog Loop	0	Do not agree. Listed as requested.
307R122PEF001011	N	9994	(912) 314-0808	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.
307R122PTF000008	N	9991	(706) 434-0810	Should be listed as Rwh but listed as R W H.	UNE-Analog Loop	0	Do not agree. Listed as requested.
307R222PTF000005	N	9991	(706) 434-0811	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 76

PON	FT	OCN	TN	Directory Listing Discrepancy	Order Type	VER	BellSouth Response
307R222PTF000006	N	9991	(912) 314-0810	Should be listed as RWH but listed as R W H.	UNE- Analog Loop	1	Do not agree. Listed as requested.
319R122PEF101023	Y	9994	(706) 434-0849	Should be listed as Rwh but listed as RWH.	DL	2	Do not agree. Listed as requested.
319R122PTF000017	N	9994	(706) 434-0848	Should be listed as Rwh but listed as RWH.	DL	0	Do not agree. Listed as requested.
319R122PTF000018	N	9994	(478) 314-0821	Should be listed as Rwh but listed as RWH.	DL	1	Do not agree. Listed as requested.
328R312PTI000002	N	9991	(912) 742-0979	Should be listed as Rwh but listed as RWH.	LLNP	0	Do not agree. Listed as requested.
330R222PEI000004	N	7727	(706) 722-8897	No listing found, but should be listed as LN.	LLNP	0	Do not agree. Listing not requested for this TN.
350R112PTI000002	N	7727	(706) 722-4544	Should be listed as RWH but listed as R W H.	LLNP	0	Do not agree. Listed as requested.
383R215PEG000004	N	7727	(706) 722-1321	No listing found, but should be listed as NP.	LNP	0	Do not agree. Listing not requested for this TN.
383R215PEG000006	N	7727	(912) 742-6976	No listing found, but should be listed as NP.	LNP	0	Do not agree. Listing not requested for this TN.
395R213PEM100002	Y	9994	(912) 746-6208	Should be listed as Rwh but listed as RWH.	Port Order	0	Do not agree. Listed as requested.
395R213PTM100001	Y	9994	(706) 828-6865	Should be listed as Rwh but listed as RWH.	Port Order	0	Do not agree. Listed as requested.
422R114PEJ100003	Y	9994	(404) 929-6480	Should be listed as Rwh but listed as RWH.	LPC	1	Do not agree. Listed as requested.
422R114PEJ101001	Y	9994	(706) 303-2412	Should be listed as Rwh but listed as RWH.	LPC	0	Do not agree. Listed as requested.
423R114PEJ101002	Y	9994	(912) 742-7604	Should be listed as Rwh but listed as RWH.	LPC	0	Do not agree. Listed as requested.
423R114PTJ100003	Y	9994	(404) 417-0398	Should be listed as Rwh but listed as RWH.	LPC	0	Do not agree. Listed as requested.
423R114PTJ101001	Y	9994	(706) 722-4464	Should be listed as Rwh but listed as RWH.	LPC	0	Do not agree. Listed as requested.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 76

PON	FT	OCN	TN	Directory Listing Discrepancy	Order Type	VER	BellSouth Response
435R114PEJ001003	N	9990	(478) 742-3853	Should be listed as Rwh but listed as RWH.	LPC	0	Do not agree. Listed as requested.
452R216PTF000002	N	9990	(706) 774-9339	No listing found but should be listed as AL.	DL	0	Agree. service rep error. Rep covered 12/15/00.
605R214PEJ000002	N	9994	(912) 742-6359	No listing found but should be listed as LN.	LPC	0	Agree. service rep error. Rep covered 12/15/00.
605R214PTJ000003	N	9994	(404) 417-0464	Wrong TN information was brought up on the screen.	LPC	0	Agree. service rep error. Rep covered 12/15/00.
606R123PEM000003	N	9990	(404) 321-4748	Should be listed as Rwh but listed as R W H.	Port Order	0	Do not agree. Listed as requested.
606R123PTM000004	N	9990	(912) 742-9886	Should be listed as Rwh but listed as R W H.	Port Order	0	Do not agree. Listed as requested.
606R123PTM001002	N	9990	(706) 724-0819	Should be listed as Rwh Enterprises but listed as Georgia R W H.	LPC	0	Agree. service rep error. Rep covered 12/15/00.

Impact:

Inaccurate provisioning will affect CLECs in the following way:

- Switch Translations—customers not receiving features that were ordered
- Directory Listing - directory listings that are not listed or incorrectly listed will result in the CLEC customers either being omitted from the BellSouth-GA directories and/or Directory Assistance databases, or having their listings incorrectly listed.

Inaccurate provisioning will negatively affect CLEC-customer relationships through unmet expectations. A CLEC customer will receive the incorrect level or type of service, resulting in decreased customer satisfaction.

BellSouth Response

Bellsouth's responses to the individual occurrences have been incorporated into the above table.

BellSouth agrees with 15 of the 22 instances for switch translations (16.9%) and 4 of the 34 instances for directory listings (7.5%)

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 117



December 26, 2000

EXCEPTION REPORT

An exception has been identified as a result of the xDSL Functional Evaluation (PO&P12).

Exception:

BellSouth did not provide a Clarification/Rejection response to a Loop Make-Up (LMU) Service Inquiry within the specified seven-day interval.

According to the BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1)¹ from the Interconnect website, a CLEC should receive a Clarification/Rejection response to an LMU/SI within seven working days. KPMG Consulting LLC (KCL) submitted 15² LMU Service Inquiry forms with the following PONs and received the Clarification/Rejection response after the seven day interval:

PON	Date LMU/SI Sent	Date CLR/Reject Received
X0R01A	8/8/00	9/1/00
X0R02A	8/9/00	9/1/00
X0R04A	8/8/00	9/7/00
X0R05A	8/8/00	9/1/00
X0R08A	8/8/00	9/7/00
X0R10A	8/8/00	9/7/00
X0R12A	8/8/00	9/9/00
X0R34A	8/30/00	9/14/00
X0R35A	8/23/00	9/13/00
X0R36A	8/23/00	9/13/00
X0R40A	8/23/00	9/13/00
X0R43A	8/23/00	9/14/00
X0R44A	8/23/00	9/14/00
X0R48A	8/23/00	9/13/00
X0R52A	8/29/00	9/19/00

¹ BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1):
<http://www.interconnection.bellsouth.com/products/UNE/bstlmulmu.pdf>

² During functional testing, 152 LMU-SI/Local Service Requests were submitted to the BellSouth Complex Resale Support Group.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 117

Impact:

The absence of a Clarification/Rejection response to an LMU Service Inquiry will delay the ordering of xDSL services. This will negatively impact customer satisfaction with the CLEC. The CLEC will also incur additional cost and time related to researching the status of the LMU.

BellSouth Response

BellSouth has reviewed the internal documents used by CRSG/Account Team and LCSC when processing requests for LMU Service Inquiry associated with xDSL services. The documentation has been enhanced to provide additional guidelines regarding handling of Clarification/Rejection responses to LMU Service Inquiry requests for xDSL services. Clerks and service reps will be recovered on the Clarification/Reject process associated with LMU Service Inquiry requests for xDSL services by 1/5/01.

BELLSOUTH'S RESPONSE TO EXCEPTION 119



December 4, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning Service Quality Measurements (SQMs).

Exception:

BellSouth-reported raw data values for Completion Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for one provisioning metric.

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.¹

As part of the BellSouth-Georgia OSS Evaluation, KCL is comparing the data that BellSouth uses to produce SQM reports for the KCL test CLEC with the corresponding data that KCL collects using its own test management tools. For each of the Provisioning metrics – *Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices (JPDY)*, *Percent Missed Installation Appointments (PMI)*, *Average Completion Interval / Order Completion Interval Distribution (OCI)*, *Average Completion Notice Interval (ACNI)*, and *Total Service Order Cycle Time (TSOCT)* – KCL compared the BellSouth-reported values for COMPLETION DATE² in the raw data files with the completion date that KCL received from Hewlett Packard for March through September 2000.

KCL could not match the BellSouth-reported values in this field with the corresponding KCL-collected values for certain purchase order numbers and service order numbers. Table 1 lists the purchase order numbers specific discrepancies for Completion Date.

¹ These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

² COMPLETION DATE is the actual date of completion of a service order.

BELLSOUTH'S RESPONSE TO EXCEPTION 119

TABLE 1—COMPLETION DATE

PON	SERVICE ORDER NUMBER	RAW DATA FILE	BLS-REPORTED VALUE	KCL-REPORTED VALUE	MONTH
B100001PEJ101069	NP5M4544	JPDY	None	8/4/00	July
F10C121PEN101002	DO3H8C92	JPDY	None	8/2/00	July
F12C121PEN101003	DO8FR6M1	JPDY	None	8/2/00	July
303R222PEH000002	CO0FWMC9	JPDY	None	10/5/00	September
307R122PEH000003	CO646VD9	JPDY	None	10/3/00	September
315R212PTH000005	CODJQDQ0	JPDY	None	10/9/00	September
323R122PEH002001	DP4C6GR1	JPDY	None	10/5/00	September
323R122PTH100003	DODP2694	JPDY	None	10/9/00	September
324R112PEH000001	CO477D06	JPDY	None	10/4/00	September
422R114PEJ100003	NO4575K2	JPDY	None	10/10/00	September
428R124PEJ100004	NP993VF0	JPDY	None	10/4/00	September
441R214PTJ000003	CPW3G381	JPDY	None	9/21/00	September
444R214PTJ100002	DPB5FYN7	JPDY	None	10/9/00	September
452R216PTF000002	RP7BNJW8	JPDY	None	10/2/00	September
627R214PTJ100004	CPV7D650	JPDY	None	10/6/00	September

BellSouth Response

KPMG reported that BellSouth-reported raw data values for the completion date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and Service Order numbers for the Jeopardy measure.

The Jeopardy measure requires that the completion date (CMPLTN_DT) for a service order number (SO_NBR) be reported in the month that the order is completed. Therefore, a record that is in Jeopardy will contain a null value in the CMPLTN_DT field for each month until the order is completed.

The service order numbers provided by KCL have completion dates that fall in the subsequent months. The following service orders; NP5M4544, DO3H8C92, and DO8FR6M1, have completion dates in the month of August, not July. Using the same logic, the following service orders: CO0FWMC9, CO646VD9, CODJQDQ0, DP4C6GR1, DODP2694, CO477D06, NO4575K2, NP993VF0, DPB5FYN7, RP7BNJW8, and CPV7D650 have completion dates in the month of October, not September. The data verifies that these records can be located in the month corresponding to their completion date.

BELLSOUTH'S RESPONSE TO EXCEPTION 119

Record Missing Completion Date

Service Order CPW3G381 was completed with the completion date of 09/21/00, which is also the original commitment date. The completion was not processed until October 2, 2000. The explanation for this can be for several reasons:

- The completed order was to restore service from a line currently suspended at the customer's request. As the order has been purged from the system it is not possible, without extensive research, to know what was on the original request.
- The order may have had fieldwork in addition to the restoral. The technician may not have had access on the original due date but since the restoral was worked, the order needed to be completed for billing purposes and the inside work removed from the order and placed on a new service order. On the due date, the order is placed on a hold status for the customer to call back and reschedule. When the order was not rescheduled, the additional work is removed from the order and the order is completed with the work that was performed. This would explain the delay in completion. As the order to restore service is a non-dispatched order it should auto complete on the commitment date.
- If the order had billing errors, was locked up in SOCS, or was a field dispatched order due to the original field work, it would have to be manually completed and could not be done until the errors were cleared or it was determined the customer no longer needed the additional work.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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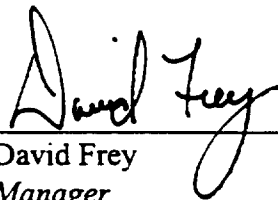
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